

From: publicaccess@lichfielddc.gov.uk
Sent: 03 May 2021 19:59
To: jwalton467@btinternet.com
Subject: Comments for Planning Application 20/00359/FULM

Mr John Edward Walton,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 7:59 PM on 03 May 2021 from Mr John Edward Walton.

Application Summary

Address: Land North Of Dark Lane Alrewas Burton Upon Trent
Staffordshire

Proposal: Variation of conditions 2 (Approved Plans), 6
(Drainage) and 13 (Landscaping) of permission
18/01491/FULM relating to plot substitution of 52 of
the approved 121 dwellings, updated landscaping and
drainage schemes

Case Officer: Ray Deans
[Click for further information](#)

Customer Details

Name: Mr John Edward Walton
Email: jwalton467@btinternet.com
Address: 56 Park Road, Alrewas, Burton Upon Trent,
Staffordshire DE13 7AJ

Comments Details

Commenter Type: Member of public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: OBJECTION:
In addition to my previous Objections to Planning Application 20/00359/FULM (nine in total on behalf of the Alrewas Residents' Group and more recently my personal Objections), I further object to the documents posted by the developer in April 2021, as set out below. It is most concerning that this Planning Application was first submitted in March 2020, has evolved in the intervening period, contains some highly significant areas of concern, has still not been determined, but house building continues at pace. Surely, work should be stopped until satisfactory and acceptable proposals have been finalised:

- 1) It is extremely concerning that the Drainage Ditch crossing of the 900 mms diameter NTS High Pressure Gas Pipeline, which was included in the Lioncourt/Atkins

submission in 2013, is still not the subject of a demonstrable approval by National Grid Gas Transmission plc or Cadent Gas Limited, regarding the specification, detail, contractor approval, methodology, level of supervision, etc.

- 2) The alignment of the Drainage Ditch from the Gas Pipeline crossing to the River Trent can easily be redesigned and constructed to avoid the destruction of "The Beach" and trees/hedges in three locations (sadly, one of which has already been cleared).
- 3) The introduction of water feature hazards (Drainage Ditch and Infiltration Basin) has not been suitably risk assessed in accordance with CIRIA guidance on SuDS.
- 4) The temporary closure required for Alrewas IR/2243 Footpath (along the southern bank of the River Trent) has not been addressed.
- 5) The Drainage Ditch crosses an area designated as Floodplain Compensation and appears to negate the effectiveness of the latter.
- 6) The ability of the Surface Water Sewer System to accommodate rainfall events, including severe rainfall events of 1 in 100 years plus 30% for Climate Change, when the River Trent is in flood, is not the subject of published assessment/calculations.
- 7) The recommendations of the Hydrogeological Assessment (reconstruction/sealing of the Infiltration Blanket and lining of the Infiltration Basin to stop groundwater infiltration into the SWS System) has not been formally proposed in the submissions.
- 8) The introduction of geocellular storage crates into the rear gardens of Plots 50 to 54 has no underlying justification (average 48 cubic metres per Plot). In addition, the access rights for maintenance and repair do not appear to be addressed.
- 9) The risk of flooding to existing properties to the south the development, appears in part, to be dependent on regular maintenance of both the paved area drainage and the SWS System. This would appear to be the remit of Estate Managing Agents, whose brief appears to be steadily increasing. The Villagers are justifiably concerned that the normal protection offered by the highway authority and drainage authority, via the adoption procedures, will not be applicable. Furthermore, the funding and legal rights of access by the Estate Managing Agents are unclear as properties have already been sold. Effectively, by whom are the Estate Managing Agents being funded, how will it operate and how long will it exist?
- 10) The decimation of large lengths of the northern hedge of the Alrewas Footpath 51 (Dark Lane) and replacement by a 1.8 metre high close boarded wooden fence, is a travesty.
- 11) Works on the biodiversity proposals of a Wildflower Meadow, should have been commenced in 2019 but have still not started.

The above should be read in conjunction with the supplementary/supporting comments on the Developer's April 2021 submissions, as set out below:

Water Risk Assessment, Green Acres Development, Dark Lane, Alrewas DE13 7AP 03/03/2021

1) The risk to construction personnel is considered to be a matter suitably addressed through the Health & Safety at Work etc Act 1974, The Management of Health and Safety at Work Regulations 1999 and The Construction (Design and Management) Regulations 2015, and as such has not been commented on in this Objection.

2) The hazards to the public of standing water in the Drainage Ditch (referred to as the drainage culvert) has been assumed to be eliminated when the construction of the Drainage Ditch is completed. This will not be the case as the water level in the Drainage Ditch will always be that of the River Trent. It is noted that a flap-valve is proposed at the outfall to the River Trent, but this will not prevent rising River Trent waters entering the Drainage Ditch via the groundwater pathway through the underlying sands and gravels. Accordingly, in the absence of suitable and sufficient hazard identification, the subsequent risk assessment is flawed.

3) With regard to the Infiltration Basin at the western end of the development, the document does not appear to be aware of the recommendations in the Hydrogeological Assessment posted on the LDC Planning website on 05 March 2021 regarding the lining of the Infiltration Basin (referred to as the Detention Basin) - "The detention basin base and sides should be lined with a low permeability welded geomembrane with appropriate coarse cover such as a stone blanket extending up the sides of the basin to prevent basal heave." This rather negates the control measures proposed of planting and vegetation to assist self-rescue/escape. Moreover, it means that the Infiltration Basin is likely to have standing water/mud in its base (following rainfall events) due to the measures proposed in the Hydrogeological Assessment to prevent groundwater infiltration into the Surface Water Sewers. Similar to the Drainage Ditch, the hazard identification for the Infiltration Basin is therefore flawed and as such renders the subsequent risk assessment to be flawed.

4) Accordingly, for both the Drainage Ditch and the Infiltration Basin, the hazards of drowning and ill-health from the standing water have not been risk assessed in accordance with Table 36.2 of the SuDS Manual CIRIA C753 dated November 2015, in which the risk assessment would appear to indicate an "Extreme risk" or "High risk" not the "Very low risk" as stated in the Water Risk Assessment, Green Acres Development, Dark Lane, Alrewas DE13 7AP 03/03/2021. Indeed, this is a categorisation that does not appear in the CIRIA C753 document.

5) Whilst it is accepted that hazards of the River Trent and the Trent & Mersey Canal already exist, it is not a justification for introducing more water body hazards, when reasonably practicable alternatives are available.

Tree Protection Plan 9937 TPP 03 (Outfall Route)

The route that the Drainage Ditch now takes appears to be a totally unnecessary destruction of both "The Beach" and three locations where trees/hedges are to be removed. Re-routing the Drainage Ditch would appear to be straight forward and avoid both "The Beach" and the trees/hedges. (NB Unfortunately, one of the locations of trees/hedges has already been cleared.) It is noted that numerous Objections have been submitted regarding this

alignment and its impact on "The Beach".

It is also unclear as to how the Drainage Ditch crosses the flood compensation area.

Proposed headwall outfall section & details P18-336:SK50
There is no mention of the arrangements for the crossing of Alrewas IR/2243 Footpath.

Materials Distribution Plan P19-2818_006 Rev H
No comment.

Landscape Scheme - GL1316 01
Landscape Scheme - GL1316 02
Landscape Scheme - GL1316 03

It is disappointing that the view of the village from the A38 travelling southbound, is now one of 21st century development. Planting to screen this view would be more acceptable.

Gas main crossing plan & section - P18-336:131
This is the same drawing that was submitted on 05 March 2021 and contains two different levels for the crown of the gas pipeline (50.860 and 50.306 mAOD), data that is absolutely critical. However, the major concern is still that there is no reference to National Grid Gas Transmission plc or Cadent Gas Limited approving the specification, detail, contractor, methodology, level of supervision, etc. It would appear highly unlikely that this drawing has been approved by National Grid Gas Transmission plc or Cadent Gas Limited when the critical crown level of the gas pipeline is not clear.

Drainage layout (sheet 6 of 7) P18-336:06 Rev C7
Five geocellular storage crates are shown which collectively offer some 241.5 cubic metres of storage. These are all located in the rear gardens of Plots 50 to 54 inclusive. It is not stated if these are sealed. However, if they are not sealed, then groundwater will infiltrate and negate the storage capacity, as the top level is below the River Trent 1 in 100 years flood level of 53.400 mAOD. If they are sealed, then the property owners need to be aware that breaching the seal on these features will negate their intended purpose and that any future maintenance could be very disruptive. In particular, addressing the inevitable likelihood that the perforated pipes will periodically become blocked and require maintenance to restore functionality.

There are no calculations included to confirm where the storage capacity requirement has been derived from.

It is not clear if these geocellular storage crates are instead of, or as well as, the reconstruction of the Infiltration Blanket in the east of the development, as proposed in the Hydrogeological Assessment, posted on the LDC Planning website on 05 March 2021.

Boundary and surfaces plan P19-2818-007 Rev H
The destruction of the majority of the Alrewas 51 Footpath (Dark Lane) northern hedgerow is of considerable concern, and appears in places to be totally unnecessary.

Attenuation tank management plan

It is unclear as to the location of the features mentioned in this document, which ostensibly refers to the Attenuation Tank. A plan showing these locations would be of assistance and would help to quantify the extent of ongoing maintenance.

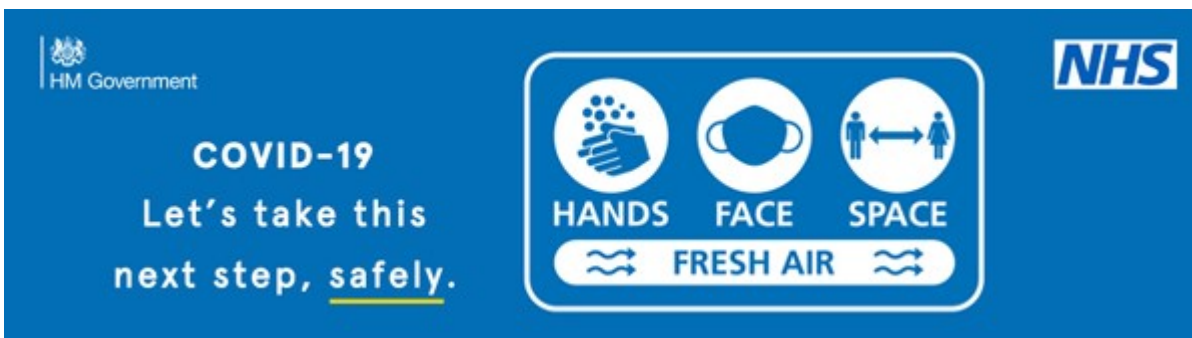
Post completion maintenance / adoption?

On a more general point, the "Attenuation tank management plan" introduces the "Estate Managing Agents". It would appear that many of the paved areas will not be adopted by the highway authority, nor will some of the Surface Water Sewers be adopted by the drainage authority. These combined with the litter and vegetation maintenance outlined in the "Attenuation tank management plan", are developing into a considerable brief for the Estate Managing Agents. Lack of or inferior maintenance could result in features not functioning as designed, in particular the surface water sewers, and hence give rise to flooding risk to the Village not being managed satisfactorily. This gives concern as to how the Estate Managing Agent is being funded and how are rights of entry into private property for repair and maintenance, etc. being assured?

Absences

There is still no submission setting out how the combined effect of the River Trent 1 in 100 years flood event and a 1 in 100 years rainfall event (allowing also for Climate Change) are to be accommodated, in such a way to prevent flooding of the existing properties to the south of the development.

There is still no reasoning/justification why the Wildflower Meadow has not been commenced, now two years overdue.



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