

From: publicaccess@lichfielddc.gov.uk
Sent: 29 August 2021 17:50
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 5:50 PM on 29 Aug 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: Karen Tate
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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: I note that over the weekend of 20 & 22 August 2021, several postings were made by Crest Nicholson and SCC LLFA in relation to the above. I have the following concerns underpinning my Objection, which in my opinion are sufficient for the LDC Planning Services to reject the Planning Application 20/00359/FULM:

1) I am unclear as to what the SCC LLFA has approved, as there are still many outstanding matters relating to documents in the public domain.

Groundwater entering the SWS System:
The Drawings in the public domain do not set out the detailed arrangements for the following:
a) The details for the decommissioning of the Infiltration Blanket. I have two concerns, namely: Firstly, the need

for the details to be known so that the approval of the robustness of the blanking off of the connecting pipework can be verified by the LDC Planning Enforcement and hence prevent groundwater ingress via this pathway. Secondly, the requirement under the Construction (Design & Management) Regulations for any residual risks to be conveyed to subsequent activities, e.g. maintenance. Someone could be working in the Manhole and not know that the "stopper" was holding back over 100 cubic metres of groundwater. Accordingly, the Infiltration Blanket (redundant) and the means of decommissioning should be shown on the Drawings.

b) The lining of the Infiltration Basin is still not shown on Drawings.

The Hydrogeological Assessment,

SHF.1132.253.HY.R.001.B in para 2.7.1 states:

"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."

c) The ten Collector Pipes under the permeable block paved and porous sub-base areas pose pathways for groundwater ingress to the SWS System. (For more detail, refer to my Objection posted on 12 August 2021)

d) The five Geocellular Storage Crate System under Plots 49 to 54 only appear to have a root protection membrane surround. For these to be prevented from being pathways for groundwater entering the SWS System, they need to be surrounded by heat welded butyl rubber membrane (or similar) with certification for the integrity of the water tightness.

The Hydrogeological Assessment,

SHF.1132.253.HY.R.001.B in para 2.6.2 states:

"So, for there to be any potential loss of design storage capacity a fluvial event would have to coincide with a high groundwater table."

This is precisely the scenario that is of concern. Site observations have clearly shown that there is close correlation between the River Trent level and the groundwater level observed in the Drainage Ditch. (NB This water in the Drainage Ditch cannot be backing up from the River Trent as there is no physical connection yet; cannot be Surface Water runoff from the development as it was observed during dry spells; and moreover, had not soaked away into the sands and gravels.) Accordingly, the Hydrogeological Assessment does not take account of the scenario where the River Trent in flood is closing the flap-valve adjacent to the development and preventing the SWS System from discharging and consequently reducing the storage capacity of the SWS System. As such, this renders the MicroDrainage calculations to be inadequate.

The Crest Nicholson, Non-Technical Drainage Note, Revision B states:

"It has been demonstrated that the drainage design for the site has the capacity for 7 days of continuous rainfall plus 30% and it would still not lead to any off-site flooding."

This confirms that the design is inadequate as River Trent Flooding events (e.g. Storms Ciara, Dennis & Christoph -

Jan/Feb 2020 and Jan 2021 respectively) were sufficient to have caused the flap-valve on the outfall adjacent to the development to be closed for several weeks.

The Crest Nicholson, Covering letter - non -technical drainage strategy note, states:

"As modelled, during the 1 in 100 years storm event plus a 30% allowance for climate change the basin provides 421m³ of storage. The basin as currently designed can actually provide 575m³ of storage whilst still allowing for 300mm of freeboard."

As stated several times in previous Objections, the maximum Infiltration Basin surface water level is 53.196m AOD (i.e. the level at which water will discharge from the SWS System out of the pair of twin road gullies adjacent to Micklehome Drive) and as such can only provide some 250m³ of storage.

2) Crest Nicholson appear to be applying pressure regarding a "deadline" of 30 September 2021 for works crossing the Gas Pipeline to be completed, with associated ramifications for the Planning Application Approval process.

The route for the SWS from the development boundary to the River Trent has allegedly involved discussions with the Environment Agency, National Grid Gas Transmission plc, Severn Trent and has been the subject of Geophysical and Trial Hole Surveys. There is absolutely no evidence (source documentation) in the public domain as to these consultations and surveys and their outcomes.

Without such substantiating evidence, how can the LDC Planning Services assess whether the Drainage Ditch alignment is the only viable option (including the adverse impact on The Beach) or is simply the easiest and cheapest option?

The Crest Nicholson, Non-Technical Drainage Note, Revision B states:

"The EA is supportive of the drainage proposal and has granted a permit for the drainage pipe to cross the gas pipe to the north of the site. It should however be noted that the permit is time limited with a seasonal constraint such that the works can only be undertaken between 1st June and 30th September."

First of all, what has the EA got to do with the Gas Pipeline crossing, and secondly, as this is a significant potential hold-point for the development, can this be evidenced.

3) Biodiversity Off-setting

The Crest Nicholson, Non-Technical Drainage Note, Revision B states:

"The proposed and approved wildflower meadow has not been formed or planted because of the on-going uncertainty over the drainage solution and works for the site. We had not wished to undertake the biodiversity off-setting wildflower meadow creation works only for the

wildflower meadow to be damaged or adversely affected by subsequent drainage works.

However, we recognise that these works should have taken place already, and therefore have arranged for them to be undertaken."

Firstly, the Drainage Ditch and the Wildflower Meadow are in completely different fields - on the original approved alignment some 200 metres apart and now on the proposed unapproved alignment some 100 metres apart.

Secondly, the above Crest Nicholson statement effectively admits that it is breaching Planning Application 18/01491/FULM Condition 11 and accordingly the "Biodiversity Impact Assessment and Habitat Management Plan' produced by Ecolocation dated September 2017" should be updated and resubmitted to demonstrate how the impact on biodiversity is to be a net gain, accounting for the changes in vegetation and hedgerow/tree removal, and include proposals for the recovery of the two "lost" years.

4) Planning Application 18/01491/FULM Condition 15

It is noted that Crest Nicholson wish to amend the above Planning Condition, which in the intervening period has been shown to be based on "flawed" input. Accordingly, it is requested that this Condition be completely revisited using the latest information, e.g. is 115 cubic metres storage in the Infiltration Basin adequate? Is limiting the rate of surface water run-off, generated by the 1 in 100 year plus 30% critical storm, to 17.8 litres per second achievable with the current design? etc.

5) Residual risks to the public - Infiltration Basin and the Drainage Ditch:

Under the Construction (Design and Management) Regulations there is a statutory duty to design out risks. The residual risk to the public of drowning and ill-health from the above two features is not in accordance with this statutory requirement. Safer alternatives are reasonably practicable, e.g. a buried Geocellular Storage Crate System for the Infiltration Basin and a buried pipe solution for the Drainage Ditch.



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