

## Comments for Planning Application 20/00359/FULM

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Wed 19/08/2020 10:40

To:alrewasrg@outlook.com <alrewasrg@outlook.com>

\_ Alrewas Residents Group,

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 10:40 AM on 19 Aug 2020 from \_ Alrewas Residents Group.

### 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:** Vanessa Morgan

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### Customer Details

**Name:** \_ Alrewas Residents Group

**Email:** alrewasrg@outlook.com

**Address:** 65 Main Street, Alrewas, Burton Upon Trent,  
Staffordshire DE13 7AE

### Comments Details

**Commenter**

Member of public

**Type:****Stance:**

Customer objects to the Planning Application

**Reasons for comment:****Comments:**

Objection:

As outlined in other Objections to this Planning Application, the ARG has serious concerns about the effect of the groundwater on the functionality of the SWS system. With the site having underlying strata of sand and gravel, this aquifer will allow the movement of groundwater. The site works by the developer and associated works by Severn Trent in the Pumping Station have shown that groundwater under the site is at or slightly above River Trent level and during River Trent flooding events, the groundwater is at River Trent level.

Atkins stated that the River Trent 1 in 100 year flood event will cause the flood level to be 53.4m AOD.

Allowing for 20% Climate Change effect, this will rise to 53.71m AOD.

The soffit level of the SWS 675mms dia pipe entering the Infiltration Basin is 53.085m AOD, the top of the Infiltration Blanket is 53.150m AOD. i.e. the high points within the SWS system in the west and east respectively.

Accordingly, when the River Trent flood level exceeds 53.150m AOD, the entire SWS system will be filled with groundwater, as both the Infiltration Blanket and Infiltration Basin are open-ended, and the non-return valve on the outfall to the Drainage Ditch will be closed. NB This level of 53.150M AOD is below the 1 in 100 year River Trent flood event level, i.e. 53.4m AOD.

It is therefore of major concern that the design parameters of the River Trent 1 in 100 year plus 20% flood event and a severe rainfall event of 1 in 100 years plus 30%, simultaneously occurring, cannot be accommodated by the SWS system and hence Surface Water will take a natural gravitational path across the site and discharge beyond its boundaries to the south. It is of great concern to the ARG on several counts, as set out below:

A - "Construction not in accordance with the approved Drawings"

As areas of paving are becoming finished, it is becoming clear that (where they can be seen or accessed from public spaces) they are not being built in accordance with the approved drawings and in direct contravention of the Flood Risk Assessment & Drainage Strategy (FRA&DS) which is a condition of the Planning Approval 18/00491/FULM (Planning Conditions 6 & 15). In particular, the FRA&DS (WS Atkins, 19 January 2015, §6.6) requires that: "There is a possibility that a rainfall event exceeding the capacity of the surface water drainage system, in particular the collection systems, may occur. This was identified as a residual flood risk in section 5.5. If such an event were to occur, run-off is anticipated to remain on the surface rather than entering the proposed drainage system. Under such circumstances, it is important to ensure that any run-off is directed in a northerly direction towards the River Trent rather than south towards the properties on Dark Lane."

An on-site examination of limited areas was conducted on 17th August revealed the following anomalies:

Access paved area in front of Plots 1, 2, 3 & 4.

Drawing P18-336-16 (T2) - as supplied by Crest Nicholson to the ARG - shows a high point at a level of 53.202m AOD where it crosses the footpath and joins the "main" estate road. From this point, it falls 352mm to the inner corner of Plot 4 to a level of 53.850m AOD. The remainder of the paved area is then shown at a constant level of 53.850m AOD - i.e. totally flat in all directions. It is assumed that this has been done to maximise the infiltration through the "porous" paving (consisting of small gaps between the paving blocks filled with coarse grit).

As a result of the on-site examination it is clear that the paved area falls from the entry point all the way down to Plot 1. This means that during any heavy rain event, infiltration will be minimised, directing water directly towards Dark Lane and the adjacent Micklehome Drive houses -- this is in direct contravention of the Planning Approval Conditions. As the original hedgerow and its associated raised bund have been removed, this could well result in flooding existing houses under the "extreme event" considerations.

An approximate survey (using sight lines, tape and spirit-level) revealed that the 352mm fall between the access and the end of Plot 4, is significantly greater at approximately 500mm. Not only will this increase the rate of flow across the surface, it will reduce the infiltration rate for that contributing area.

As the paved surface continues to fall towards Plot 1 and, whilst the threshold levels of the front doors of

the properties maintain a comparable height above the paving, this gives rise to a serious query as to whether the finished floor levels of Plots 1-4 have been built in accordance with the plans. As these 4 houses are set lower than most of the rest of the estate, this is a critical concern.

Note: Whereas the "porous" paving may work in the first instance, natural dust and debris will quickly fill the small gaps and render the surface impermeable and, therefore, where excess water is directed becomes critical to compliance with FRA&DS.

Access paved area enclosed by Plots 16, 11, 12, 13, 14,15, 16, 17, 18, 19 & 20.

This enclosed area could only be viewed from outside the perimeter fence line.

Drawing P18-336-16 (T2) - as supplied by Crest Nicholson to the ARG - shows the highest level at 54.060m AOD to the lowest at 53.600m AOD, giving rise to a difference of 460mm to the corner by Plot 16.

All of the paved area and roof drainage from the surrounding houses drains to land drains under the hard surfaced area. There is no drainage led directly to the main piped stormwater system.

Although subjective, the directions of fall and relative differences did not appear by eye to tie in with the levels and falls shown on the approved plans.

The lowest perimeter level around the area is 53.800m AOD alongside the Dark Lane footpath. Due to known high groundwater levels, the land-drains are unlikely to work under extreme event conditions and

this whole paved area will be prone to flooding and over-topping. Since the lowest external discharge point is to the Dark Lane footpath, this could result in flooding to adjacent properties in contravention of the FRA&DS and Planning Approval Conditions.

#### Requirement

In order to comply with the Flood Risk Assessment & Drainage Strategy conditions, and to limit the risk of an extreme event flooding the houses alongside the Dark Lane footpath (along the whole length), the raised bund on which the hedgerow sits, and which has been (or is proposed to be) removed, needs to be reinstated and maintained along the full length of the development in order to provide protection to the rest of the village.

#### B - "Floodplain compensation"

It is noted that none of the proposed River Trent Floodplain compensation areas have yet been constructed.

It is also noted that on Drawings P18-336-01, 06 & 07\_T6 the base of the proposed Floodplain compensation areas is 53.65m AOD (i.e. above the River Trent 1 in 100 year flood event level of 53.4m AOD), 53.175m AOD (225mms below the River Trent 1 in 100 year flood event level of 53.4m AOD) and 53,3m AOD (100mms below the River Trent 1 in 100 year flood event level of 53.4m AOD) respectively. The proposed areas will, therefore not provide flood compensation as required.

#### C - "Roof drainage"

It is noted that roof drainage discharges to soakaways, often under the road. e.g. The road serving Plots 1 to 4, 11 to 20, 34 to 39 and 41 to 46

(Drawing P18-336-04\_T6). Using these sections of roads as examples, is it proposed that they be offered for adoption by Staffordshire County Council and if so, is the roof drainage arrangement acceptable?

D - "Adoption of SWS system"

It would appear that most sections of the SWS system receive non-highway drainage and hence it is assumed that the SWS system will be offered to Severn Trent for adoption. Are Severn Trent aware of the adoption queries raised by the ARG and have they confirmed that they will be adopting the SWS system?

E - "Adoption of the roads"

There are large areas of SuDS surfacing, i.e. permeable bituminous and block paved areas. Has Staffordshire County Council been offered these areas for adoption and if so what is the proposed maintenance regime? (frequency of jet washing, brushing vacuum cleaning, replacement of grit infill, etc.). Without such maintenance these areas could significantly contribute to surface flooding on the development and the adjacent existing properties, particularly in Dark Lane, Micklehome Drive and Selwyn Close.



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