

Moorpool Residents Association.



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The Planning Department,
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S/00872/08/FUL
S/00869/08/CAC
S/00874/08/FUL
S/00870/08/CAC
S/00873/08/FUL
S/00871/08/CAC

Dear Sirs,

We are writing in response to the Glanville FRA document which has been made available for inspection. Due to the length of time since our original submission and the opportunity the applicant has been given to make further submission, we feel it is right that we should also be able to make further general comment on these applications which we hope you will take into account.

We would ask you to consider how urban creep i.e. the increase in new impermeable area at residential property from the paving over of gardens, building of conservatories, etc. which can add large additional impermeable areas will be controlled and monitored and whether an article 4 direction should be applied at the developers cost to these developments?

Whilst the applicant has proposed solutions to the problem within site A, they are not in a position to manage the potential events downstream which can affect the drainage. The culverted stream passes through a further culvert under Margaret Grove through to an allotment/nature area where it meets another stream. Events here may cause 'backing up' of water.

The FRA report states the land slopes generally from West to East but omits that the area is a valley with slopes from the North and South to the low point which contains a culverted previously open stream. Houses are also present to the North and South of the development.

The North and South slopes inevitably produce overland flow to the floodplain at the valley base which is clearly evident where paths from, for example, Margaret Grove enter the garage area.

The applicant has not demonstrated fully how environmental issues will be addressed during construction. These include removal of garages, some of which have asbestos roofs, opening up of the existing culvert, prevention of debris ingress, diversion of the existing culvert and how this will be achieved particularly if an extreme rainfall event occurs.

The applicant proposes diversion of the existing sewer which passes through the remaining allotment area. Will parts of this sewer be left in situ? Will there be potential environmental damage from spillage? How will disruption to the many properties served by this sewer be managed? What compensation will be offered to the community for the disruption caused by these works? Will the sewer have to be closed off and the effluent pumped over ground? In our view any failure of the sewer system as a result of these works would therefore cause considerable inconvenience to a large number of households. In a case previously referred to the Secretary of State this was deemed unacceptable.

We also submit that there is an increased risk to the nearby properties during the sewer work from an extreme or prolonged rainfall event.

We ask you to consider the issue of prevention of ingress to the existing culvert of debris, mud and effluent from a building site which can cause environmental problems downstream.

We ask you to consider the environmental problems downstream if water flow is temporarily stopped or pollution occurs.

Clause 6.1 says that upstream flooding does not reach the site A. This is clearly wrong. The enclosed photographic evidence shows water gathering in the dip of Ravenhurst Road above Site A which comes down Ravenhurst Road from both directions and a photograph of this water spilling down the bank onto site A. Why has the modelling software not shown this? This dip acts effectively as a water bank at the moment, allowing the road drains to cope with normal rainfall. However during heavy rainfall, the whole width of the road floods and the raised pavement is breached allowing the spillage shown. This will be worsened when the access road to the new development is blended in to Ravenhurst Road. Note the flooding pictured in Ravenhurst Road is in June, not spring or even autumn when leaf fall can worsen the problem. The existing road drainage infrastructure is therefore already operating beyond its limit, pre-development and no proposal is included to upgrade it.





In 9.1 of the FRA, Glanville say the existing flooding re enters the sewer system before the site. This is contradicted by the above evidence showing the water cascading down the bank into site A.

The applicant has included various environmental efficiency aspects to their designs. Some, such as solar panels, are quite out of keeping with the local environment. We note that they have not included significant detail for rainwater harvesting or water recycling other than a minimal water butt. Any provision is only 'likely' not definite. (7.4 FRA)

Building Regulations Approved Document H3 (Rainwater Drainage), which came into effect in 2002, requires that rainwater runoff from developed areas be discharged in an adequate soakaway or some other adequate infiltration system, unless this is impracticable. In the applicant's proposal the soakaways are upstream of the development.

We also understand that the Environment Agency requires soakaways be used for roof water only before it suffers contamination from other sources.

In PPS 25 Para 5 planning policy shouldensure that flood risk is taken into account .. to avoid inappropriate development in areas at risk of flooding.... Where new development is, exceptionally, necessary in such areas policy aims to make it safe without increasing flood risk elsewhere..... We question whether development in either Site A or C is 'exceptionally' necessary.

In PPS 25 Para 6 Management, we do not consider that the benefits of development outweigh the flooding risks. What are the benefits of development when any adverse issues on these sites can be overcome with more environmentally friendly solutions?

We understand that the Water Framework Directive goes further than the Building Regulations and planning policy statements by stating that water run-off must be cleaned at source, not just controlled.

8b of the FRA asks who will manage the risks over the lifetime of the development - and it states "By the owner of the property". Who then looks after the soakaway? Will Graingers be looking after it for the lifetime or is it the owners of the new houses, or whoever owns the allotments in years to come? Have Grainger put aside funds for this maintenance?

To prevent silting of the soakaways a catchpit (s) will be necessary. As all schemes are different, the frequency at which the catchpit(s) should be emptied will need to be determined on site and appropriate arrangements put in place.

Further to our comments on management, will any of the proposals contained in the FRA or applications preclude adoption of the roads at some point in the future by BCC?

We submit that BCC in considering this application should take into account the recent management of these areas and whether the technical solutions being proposed will be supported by a sufficiently robust system of management. We would question whether the applicant and even STW are properly aware of the issues even though they have had past experience of dealing with the consequences. The solutions proposed must be capable of coping with flooding issues in the long term. We expect that anything built in a conservation area should be as durable as the existing properties and give no more trouble.

Clearly something needs to be done to alleviate this flooding problem. We would request that the opportunity is taken to not only reject the building of new properties in this area and the loss and damage to allotments but to require an environmentally acceptable solution such as:

- Swales (shallow ditches) and basins that can be used to hold water for gradual water dissipation into the existing infrastructure or;
- Held in a "balancing" pond, or wetland.

The basic requirements of sustainable drainage are that:

- Water run-off from an area following development should be no greater than it was before development
- Following development, there should be no deterioration in downstream waterways or habitat
- Water resource management integrated into the design of a development from the outset.

Some of these problems have been caused by the culverting of the stream and the loss of the existing allotments which acted as a water bank. We would ask that any replacement garages are built in a way that allows the water to dissipate safely.

We agree and believe there would be support from residents for increased allotment area provision properly used and managed as the next best option if existing community garages are not rebuilt.

We disagree with the notion that the garages are in too poor a state to retain. Many of these garages are perfectly serviceable, particularly the central block and those to the south side on the lower area of site A. Security to the garages at the rear could easily be achieved with a small amount of fencing and a gate. Lighting supply is available to these garages but has not been maintained whilst lighting in site C has indeed been replaced.

We note that the FRA does not cover Site C despite the issues raised with regard to overland water flow from the bottom of this site to the rear gardens of Margaret Grove. Is this because the modelling software does not illustrate reality? We would be surprised too if the flooding mapped at the top of Ravenhurst Road does not contribute to the issue in the dip whereas the FRA map shows it disappearing.

We note that a +20% allowance has been agreed for climate change which corresponds with PPS 25 Table B2 year 2055-2085. This assumes these properties and those around them will be demolished in 76 years. This is unrealistic taking into account the conservation aspects of the estate and the quality of construction of the existing houses. We submit that the + 30% allowance for peak rainfall intensity should be used.

We note that in the FRA, the drawing showing existing SW catchment and existing network layout drainage is inaccurate as it omits a number of properties adjacent to the valley Site.

We ask you to consider whether the flow of water from the Moor pool and upstream has been taken into account with regard to capacity requirement of the SW sewer.

We ask you to consider how the computer modelling has been verified and against what event situation. For example, a model which has been modelled against a 6 week short term flow survey may not give a sufficiently accurate model against extreme rainfall events which are becoming more prevalent. Advice from the Met Office is that these cannot be reliably predicted. This may be why some of the results are at odds with reality.

In particular we ask that you consider B10 of PPS 25 in relation to the Site A development.

We ask that BCC consider the impact of construction traffic on the environment and that all materials and parking of operative's vehicles should be on site. However materials including soil should not be stored in areas prone to flood.

We ask that consideration is given and approval sought as to how these sites will be secured and all necessary access rights maintained. This should include a risk assessment taking into account best practice environmental standards.

As details of lighting for the developments do not appear to have been submitted we ask whether Lighting in the Countryside: towards Good Practice, which is equally applicable in towns will be taken into account.

We ask that BCC set conditions on hours of working, noise levels, dust and suppression. The Code of Construction Practice should be submitted detailing these matters.

We ask that BCC satisfy themselves that if started, this development can be completed within an agreed timescale because of the architectural heritage of the estate and that a scheme for phasing of the development(s) should be submitted

As we have doubts as to the effectiveness of these drainage proposals in addition to their being unacceptable we request that you condition the right to require modifications to the design and construction to overcome any problems in the future.

We ask that a management scheme for all replanting and landscaping on the sites is submitted and agreed before any planning approval including species, sizes, numbers and density. This should include phasing, completion and maintenance of the landscaping and public or open spaces for the lifetime of the development.

We ask that the measures that will be taken to protect existing landscape features including trees and hedges shall be submitted and approved. We have already submitted that the existing trees and hedges are a valuable resource which should not be destroyed.

The arrangement of the proposed new houses raises the issue of loss of privacy and amenity to existing properties. This is applicable to Site A and particularly Site C.

We ask that BCC require that any parking space or garage included with any new property shall not be used for any purpose other than the parking of private motor vehicles. There are local examples of garages converted to living accommodation and it would not be acceptable for the local parking problems to be compounded in this way.

Further, the MRA has seen the content of objections from the MRG (Moorpool Regeneration Group) and the MAA (Moorpool Allotments Association) and fully supports the points contained in those documents. We believe the damage to the allotments both short term because of the building work restricting their use and long term due to damage from the drainage work to be completely unacceptable.

We note that the proposals are subject to further investigation before a definite design is available. We do not consider that we can properly evaluate this scheme until this is done and that if our objections and comments had been taken seriously the applicant would have provided this information.

We would also point out that in the Grainger Statement of Community Involvement S/00872/08/FUL it is claimed a steering group was formed to discuss the development proposals and subsequent follow on meetings took place. This is not the case as the CAMP meetings were to discuss the introduction of the 4(2) Direction. Grainger took the opportunity to introduce their proposals for development at the meetings but as at 26.10.2006 did not even have drawn up proposals to present (for which we have an evidential letter from Tim Nicholson of Grainger).

With regard to garage use we note that in Graingers Supporting Planning Statement S/00872/08/FUL 2.13 and 2.18 it is acknowledged that around half of the garages on Site A and C are used for vehicle

storage despite those that are unusable due to neglect and subsequent vandalism. All 3 garages are used on site E.

We reiterate all the points made in our original submission and have serious doubts as to the long term effectiveness of the solutions proposed by Glanville.

We therefore ask you to consider the points of objection contained in our submissions and ask that you refuse the applications in their entirety, unless conditional on the replacement of any garages demolished with new garages or allotment/amenity space.

For your convenience we have submitted this application both as a hard copy and complete on disc (enclosed).

Also enclosed is an overlay of the Glanville's drawings of the existing and proposed drainage solutions.

Yours sincerely

Rob Sutton.
Chair: Moorpool Residents Association.