

The Moorpool Regeneration Group

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Dear Simon

Re: **Flood Risk Assessment** (ref 030_HH260321_KJ_AD005)

We have now had an opportunity to review the FRA submitted by Glanville on behalf of Grainger and we would be grateful if you could note our following comments when reviewing their proposals.

1. References to Zone 1 risk banding are irrelevant. The Environment Agency only classifies areas at risk from river or sea and our concern on the Valley Site is that of surface runoff.
2. The report relies heavily on 1-in-30 year or 1-in-100 year 'worst case' scenarios. These must be put in context: The Environment Agency reports that last summer, in the Midlands area alone, 1-in-100 year floods were experienced on two separate occasions (June 19th near Bewdley and July 20th in the Cotswolds) and in 2007 there were also two separate events. We have also presented photographic evidence in our original objection documents that this has already happened in the Valley Site much more frequently than once in 30 years.
3. In 7.1 & 7.2 they suggest the impermeable areas will remain about the same. One look at the "impermeable" areas at present will show they are in very poor condition and thus allow considerable water / rainfall through them to the soil. Therefore the totally impermeable areas laid by Grainger will significantly increase the runoff. We also doubt it will be restricted to 0.3Ha when considering the area of roofs, garage forecourts, pavements and roads.
4. In the back of the report (7.5) there is a statement which admits there could be foul water flooding. This is not the case at present and would represent a very significant health hazard. If even their own report admits foul water is a possibility then their assessment must be rejected pending more substantial and informed surveys.
5. In 9.1 they say the existing flooding re-enters the sewer system before the site. We seem to recall that all the pictures showed it at the bottom of the site. It is this kind of totally inaccurate statement, similar to those highlighted in their ecological surveys, which cast doubt on the whole veracity of the document.
6. They suggest a new drainage system will solve many problems but the increase of 88m³ down to 83m³ of water, and given the very inexact science we are dealing with, is barely within the margin of error on the computer program.
7. Despite their confidence in the low possibility of flooding, they nevertheless suggest two particular solutions. The first is raising the houses by 8" and the second installing a soakaway.
 - 7a Concern has already been raised on how the proposed new housing will overlook current dwellings and raising the structures will further exacerbate this issue. On a more pragmatic note, there seems little logic in raising the houses by 8" while leaving the proposed gardens, garages and access routes exposed to risk.

- 7b The proposed development is already destroying a large proportion of the allotments. The installation of a soakaway will destroy the remaining allotments and associated hedgerows and the wildlife that rely on these green areas. It is doubted that these remaining allotments could be satisfactorily reinstated and this, in particular, is such a radical change to their original proposal that the plans should be rejected for revision.
8. The easement referred of in the report is not an easing of rules but the legal wayleave which Severn-Trent Water require to allow them to adopt the sewers. They have already indicated that they would be most unlikely to permit this. This situation should be clarified with SWT together with their opinion on this report before a final decision is reached.
 9. The report also suggests further research is required on the underlying soil structure before a final judgement can be made. Indeed, I understand that the current thinking by the Environment Agency is that tests should be carried out to confirm the assumed soil infiltration rate before a soakaway can be considered and then only after alternative storm water disposal solutions have been considered, which they do not seem to have been.
 10. In view of the above (8 & 9), these uncertainties should be resolved before the application is considered in entirety.
 11. It is unclear if the report has taken into account overflow from the Moor Pool itself. This could clearly have a significant effect on already marginal calculations.
 12. The new drainage and soakaway will require maintenance and there is no clarity on who will be responsible for the cost and management of this. Would the Council be willing to adopt this new roadway with associated costs? Or would this be the responsibility of the proposed new house owners? In which case how would it be enforced and managed. Grainger's track record is less than exemplary in such matters.
 13. And, finally, no reference has been made to the surface run off reported from Site C (Ravenhurst Road), which was raised in our original objections and those of individual residents. The same arguments of increased coverage apply (item 3). New developments would decrease the soil take-up and increase the storm water flow through the existing gardens in Margaret Grove.

I would finally suggest that this report simply provides further evidence that the proposed development is totally inappropriate and should be rejected.

Best regards

A handwritten signature in blue ink that reads "Andrew Hackett". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Andrew Hackett
Moorpool Regeneration Group