**Response to Planning Applications to be determined by Maldon District Council.**

Response from: MUNDON PARISH COUNCIL

Planning Application Reference:

**Application No: 19/01093/FUL – Full Planning application for infrastructure works, including foul and surface water drainage; provision of highways; site levelling and associated works for the western parcel of planning permission FUL/MAL/18/00071**

*Our views on the above application are:* Please tick the appropriate box

1. We recommend the granting of planning permission, for the reasons listed below:

\*

or

x

1. We recommend the **refusal** of planning permission, for the reasons listed below:

\*

Mundon Parish Council object to the planning permission for this application due to concerns over the flood risk assessment – please see full details below:-

or

 Mundon Parish Council wish to raise concerns over the flood risk assessment (FRA) for Planning application 19/01093/FUL from Crest Nicholson (Eastern) for Land South of Wycke Hill; It would appear that the FRA has attended to Condition 60 of the Outline Planning Conditions in regard to on-site property flooding (Para. 3.20), but as a consequence has failed to satisfy National Planning Policy Framework requirements (and Maldon District Council LDP Policy D5) in not increasing flood risk elsewhere (and where possible reduce flood risk overall), as a variety of the proposals will now increase the potential of flooding downstream during high/extended rain-fall events. There is no specific mention in the FRA of the series of large reservoirs starting just 300m to the North West, and as Para. 3.34, 3.35 and 3.36 completely ignores this reality, it can only be assumed these have NOT been taken into account (Para. 4.2). However, regardless of whether bank breaching of those reservoirs has been taken into consideration within calculations, the proposed diversion ditch on the Northern and Western sides of the development has been classified as a swale (Para. 4.3), yet the ditch fall and open ends suggest they are more of a flowing ditch designed to divert fluvial and pluvial flood water (Para. 3.17, 4.3 and 4.8) directly and un-attenuated into the existing watercourses, one of which is already classified as High Risk (Para 3.18, 3.30 and 4.2). This means that all current natural overland spill areas (Fig. 3.2) that automatically give an attenuation effect are entirely lost (Fig. 4.2) and surges are re-directed un-attenuated to the downstream systems. This makes Para. 4.11 entirely incorrect. Allied to the total discharge rates from all proposed on-site swales (Appendix B), considerably increased surges will be sent down the existing ditch/brook system. The FRA consistently mentions the Proposed Drainage Strategy 181870-03, yet all that appears publicly available for scrutiny is the single page drawing in Appendix B. The Appendix B page proposes on-site swales that on average only have a working depth of 1m (appendix B), therefore with even a nominal amount of annual silting, they will readily become hugely inefficient and further increase un-attenuated flows if the spill overland, especially as currently there has been no suggestion of who/how a self-funding maintenance regime and riparian obligations (4.19 and 4.28, Table 4-1) will be put in place (as required within Condition 61). Maybe this is why even the FRA states finished floor levels of houses should be up to 300mm above natural ground level (Para. 4.15, 4.16, 5.10 and 5.11). The 2 Limebrook drainage systems join Woodham Mortimer Brook, which then culminates at a tidal sluice 4 km to the East (conveniently missing from Fig 1-2), which can only empty into the River Blackwater through gravity sluice valves at low tide. More importantly, the 2 sluice chambers also receive all the water from the Mundon and Purleigh Wash drainage systems which are already heavily impacted after high rain fall events, as the set-up gives priority to the Limebrook/Woodham Mortimer discharge. This is not mentioned within the FRA. The FRA awareness of the current vulnerability to fluvial and pluvial flooding of the downstream system is eluded to in Para. 3.4 and 3.13 and graphically shown by the fluvial flood risk map in Fig. 3-1 and 3-3, although both fail to show the consequential impact to the Mundon/Purleigh Wash drainage systems. If high/extended rainfall also coincides with Spring tides, the whole system is put under further pressure, backing-up and flooding huge areas as the sluice valves are tide-locked for extended periods. With the current FRA proposals, it does appear that property on-site may well be protected from flooding, but with the FRA quoting A414 flooding expected at up to 150mm (Para.4.18 and 5.12) and the huge increase in downstream flooding issues, this FRA is not fit for purpose. That is without even taking into account the upstream reservoir system issue.

1. We raise no objection but wish to make the following comment:

**\*Reasons for response (Please include the relevant policy in the Submission version of the**

**Local Development Plan i.e. Policy D1 – Design Quality and built Environment, Policy S8**

**Settlement Boundaries and the Countryside)**

 **Signed**: Sarah Sayer **Date**: 5/12/2019

Version May 2016