

Mr M Holm
Environment Agency
Rivers House East Quay
Bridgwater
Somerset
TA6 4YS

10th April 2014

Dear Mr Holm

Re: Green Pits Lane, Nunney, Frome – Mendip District Council Planning Reference 2014/0198

We refer to your letter dated 4th April 2014, reference WX/2014/125520/01-L01, objecting to the above outline planning application on the basis that the FRA fails to assess and address the risks of flooding from the proposed development and is therefore contrary to the principle of the NPPF.

We believe that the FRA fully assesses and addresses all risks of flooding and demonstrates that the site can be developed without flood risk and that the proposed drainage strategy will also reduce flood risk in Glebelands.

The FRA acknowledges that there are existing flooding issues in Glebelands resulting from run-off from the green-field site (see section 3.4.4 and 5.3 of the FRA, and photographs in Appendix H). The site generally falls towards Glebelands; the upper soils on the site are impermeable clays resulting in overland flows on to Glebelands during more extreme events.

Infiltration tests show that the western part of the site and northern edge has permeable soils below the upper clay soils (refer to section 4.1.4 of the FRA and Appendix E). The proposed strategy is based on infiltration in to the permeable strata below the upper clay soils.

Flows from the developed site will be intercepted by the new drainage system and conveyed to the two infiltration basins. The basins have been sized to attenuate and infiltrate all events up to and including the 1:100 event with a 30% allowance for climate change (refer to section 6 of the FRA and calculations in Appendix G). Basin No.1 attenuation is approximately 380m³ for the 1:100+30%CC event, and Basin No. 2 119m³. The calculations show freeboards of 321mm for Basin No. 1 and 412mm for Basin No. 2 (refer to section 6.2.3 of the FRA). Basin No. 1 has a capacity of approximately 296m³ above the 1:100+30% level, and Basin No. 2 approximately 156m³. Half empty times for the 1:100+30% event are 114 minutes and 85 minutes respectively. The volumes of run-off can therefore be safely contained within the infiltration basins and discharged to ground.

In addition to the infiltration basins an infiltration trench is proposed along the northern edge of the development adjacent to Glebelands connected to Basin No. 2; this will intercept run-off from the open space and prevent run-off on to Glebelands (see 'Drainage Strategy' drawing 359-P02C in Appendix F, and section 5.3 of the FRA).

The proposed development will intercept all run-off from the site and discharge it to the permeable soils underlying the site. This approach will ensure that there is no run-off from the site and that flood risk to Glebelands and Pookfield Close is reduced significantly.

We believe that the concerns raised in your letter have been satisfactorily addressed by the FRA and that the above clarification is sufficient to enable you to remove your objection. Please do not hesitate to contact us if you would like further clarification or have any additional queries on our FRA and Drainage Strategy.

Yours sincerely



Peter Amies
Phoenix Design Partnership

cc Mr M Williams, Mendip District Council
Mr C Dolling, Barratt Homes, Bristol
Mr D Weaver, Pegasus Planning

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