



Proof of Evidence - **Summary**
Hydrology, Drainage, & Flood
Risk Assessment

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Rule 6 Party
Peel Hall - APP/ M0655/W/17/3178530

Since August 2016 when the current planning application was first submitted there has been a series of major flood events throughout the UK.

Warrington has not been immune to these events. In the past few years alone a number of locations locally have suffered from serious flooding, including:

November 2019 - Densham Avenue Longford

November 2019 - Hawley's Lane Dallam

October 2019 - Densham Avenue Longford

September 2019 - Longford Skoda Garage

July 2019 - Hawley's Lane Dallam

September 2012 - Densham Avenue Longford

September 2012 - Hawley's Lane Dallam

September 2012 - Meadowside Primary School Warrington

In the light of events both locally and nationally there is now great concern amongst residents living in the vicinity of the Peel Hall site that the proposed development will lead to flooding on local roads and housing areas going forward.

The Peel Hall site is one of the last remaining areas of open land in the north of Warrington and it is essentially land-locked, bounded as it is by the M62 motorway, Winwick Road and a number of existing housing areas.

Warrington was designated as a New Town in 1968 and the Peel Hall site formed part of the original New Town Master Plan. Development commenced in the early 1970s across the north of the town and by the end of the decade much of the New Town development east of the A49 Winwick Road had been completed, other than the Peel Hall site.

My own recollection, as a design technician working in the drainage department of the New Town at that time, was that the Peel Hall site was regarded as extremely difficult to drain, and information recently obtained from the Cheshire Record Office has shown this to be correct.

In 1980, after four years of assessing the Peel Hall site the New Town's action area team concluded that due to drainage and mining constraints the site could only accommodate some 175 private dwellings with the remaining area continuing as farmland. This was a far cry from the 900 private and rented dwellings that had originally been envisaged for the site by the New Town, and this decision removed

over 700 programmed properties from the very same land where the appellant is now proposing to build 1200 additional properties.

The Peel Hall site was eventually sold to the appellant as farmland in September 1988, and since then it has been the subject of numerous failed planning applications spanning a period of more than 30 years.

A full review of the appellant's FRA has been provided to the Inspectorate as a separate document. Areas we have covered include a detailed examination of the contents of the current FRA and a full assessment of the FRA when measured against current and future legislation. We have also highlighted important information sent to the appellant by the Environment Agency in 2012 in relation to the site and to the Spa Brook which we believe should have been included in the FRA as part of the overall assessment of the site. Finally we have carried out a full assessment of the information we recently received in respect of WNTDC's proposals for the Peel Hall Site.

The guidelines and checklist for the preparation of a site-specific flood risk assessments are set out on the GOV.UK website. These state that *'the information provided in the flood risk assessment should be credible and fit for purpose'*. They also state that *'a flood risk assessment should also be appropriate to the scale, nature and location of the development.'*

Having now completed our review we don't believe that either of these statements can be applied to the appellant's current FRA when viewed alongside the site specific FRA checklist set out on the GOV.UK website.

Firstly we would point out that the appellant's FRA consists of just nine pages of text and five appendices. The text is virtually the same as that contained in the appellant's original FRA from 2016 except for a number of additional paragraphs relating to a Water Framework Directive. The five appendices are exactly the same as those contained in the original FRA and they have simply been copied across from that report.

We highlighted in Section 4 of our full review that both the text and the appendices of the appellant's current FRA contain a substantial number of errors of a general nature including omissions, incorrect statements and out of date references.

In addition the appellant's current FRA generally offers very little explanation in relation to much of the content of the appendices attached to the main document. In particular we have highlighted foul and surface water run-off calculations with no supporting documentation and flood maps which have simply been abstracted from the EA website and attached to the main document, again without comment. There

is also some evidence of a CCTV survey having been carried out at the western end of the site, but again there is no explanation as to why this was undertaken or what results were achieved.

Finally on this issue we are concerned that the appellant continues to rely upon a FRA that was originally prepared over four years ago and has remained virtually unchanged ever since, despite major changes to legislation over that period.

In that respect the appellant only refers to a single framework reference document in support of his FRA, namely the WBC SFRA Level 2 Assessment, and even then he has only included seven pages of this document in his submission.

Turning to the Peel Hall site itself then our full review highlights a number of major issues in relation to the site and the surrounding catchments which simply haven't been addressed in the appellant's current FRA, including:

- the ability or otherwise of the Spa Brook and other field ditches to discharge surface water run-off from the site
- the source of the Spa Brook upstream and the potential for flooding should local groundwater abstractions eventually cease
- the potential for flooding via the use of a long and fixed diameter existing culvert to discharge surface water at the downstream end of the site
- the potential for flooding across the site from existing groundwater discharge
- the location of two critical drainage areas immediately downstream from the site and the potential to cause additional flooding in these locations

Above all, however, we would point to the fact that the appellant's FRA makes no reference as to how flood risk at the site will be affected by climate change. Flood events in 2019 and 2020 have made this a more prominent issue within the planning system and there have been policy changes. Climate change will make the situation more critical.

The appellant's FRA needs to be reassessed against the most recent and relevant climate data available from the Met Office. This includes an assessment of the likelihood of groundwater flooding and the role played by watercourses bordering and running through the site.

Given the size of the proposed Peel Hall development and the scope and extent of the drainage issues that are all too apparent across the site then it is our contention that the level of the information provided in the FRA is not appropriate to the scale, nature and location of the development; and neither is it fit for purpose given the

document's complete failure to demonstrate that the Peel Hall site can be adequately drained as part of the current planning application.

Vital issues such as the potential for the Spa Brook to flood should groundwater abstractions eventually cease have simply not been addressed, despite the fact that the appellant's representative was provided with this information in 2012.

Further, the unsubstantiated statements in the FRA regarding the use of the Spa Brook culvert as an outfall sewer for the proposed development are deeply concerning given that Warrington New Town concluded that Spa Brook has no spare capacity for any increase in flow. The FRA also fails to address flooding issues that might arise downstream of the Peel Hall site in areas already at risk from regular flood events.

There are many hundreds of residents who live in close proximity to the site whose properties might be put at greater risk of flooding as a result of the proposed development. Their welfare is paramount when it comes to making decisions about the Peel Hall site and yet their concerns have been completely ignored by the appellant's FRA.

For all of these reasons we don't believe that the current planning application provides sufficient evidence that the hydrology, drainage and flood risk at the Peel Hall site has been adequately assessed by the appellant.

Accordingly the Rule 6 group believes that the appellant's FRA should be rejected as a formal submission and that the appeal against refusal to allow the Peel Hall site to be developed should again be turned down.