

Risk of Flooding.

The Rivers Agency 2nd Cycle Flood Maps indicate that parts of the site act as a 1 in 100-year fluvial flood plain. One such area is adjacent to the location where it is proposed to culvert a watercourse to provide access to the site. The culverting of the watercourse and the creation of the road at this location will exacerbate and increase the risk of flooding both for the site existing properties. In addition, sections of the immediate banks of both the Island Vardin Drain and the Ballysally Blagh Drian which border the site are **classified as 1 in 10-year fluvial flood plains.**

Rivers Agency Maps based on the effects of Climate Change indicate a significant increase in the area of the site which will act as a fluvial flood plain in the future. This includes the area where it is proposed to create access to the site and install the culvert. Please note the Rivers Agency maps for this area have been modelled in detail therefore making them more reliable. Based on these maps there is a real risk the access to the site would be flooded thereby cutting the site off. **These maps also indicate flooding where proposed sites 1,2,3,4 and 7 are located.** There is some debate as to whether or not climate change factors and flood maps are taken into account during planning decisions but they were a consideration for the recent planning application by Royal Portrush.

Section 8.49 of the Planning Report states Policy FLD1 does not make specific mention to the 1 in 100-year climate change fluvial flood plain. Policy FLD1 is part of PPS 15. **Section 5.3 of PPS 15 states all planning applications will be determined with the most up to date flood risk information and this should include the latest information on climate change.** It states this information is important in facilitating the assessment of flood risk over the lifetime of the proposed development. One of the main objectives within PPS 15 is to adopt a precautionary approach in the determination of development proposals in those areas susceptible to flooding.

The Planning Report states the Regional Development Strategy is a material consideration in the planning decision. **RG9 of the strategy states development should be minimised in areas at risk from flooding from rivers and surface water runoff. It highlights taking a precautionary approach using the latest flood risk information that is available. It also requires areas at risk due to climate change to be identified. This includes areas that may be impacted by increased flooding.**

Likewise, the Strategic Planning Policy Statement is conformed as a material consideration. **The SPPS states the planning system should help to mitigate and adapt to climate change by avoiding development in areas with increased vulnerability to the effects of climate change particularly areas at significant risk from flooding.**

Rivers Agency Flood Maps also indicate the majority of the site is at risk of surface water flooding. The maps also indicate the situation will get worse due to climate change. The drainage assessment accompanying the application states the development will eliminate this due to the installation of a dedicated drainage system. Whilst that may be true it will have the knock-on effect of increasing the risk of flooding elsewhere. **The site in its current green field state acts as a sustainable drainage system. Developing the site will turn it into an area of impermeable surfaces which will lead to significantly larger peak discharge flows in the watercourse downstream and thus an increased risk of flooding.**

Insurance companies use flood maps to determine those properties at risk of flooding. Residents are already encountering issues when renewing insurance annually due to flood risk in this area. Some companies are either refusing to give a quotation or providing quotations for policies which exclude flood risk e.g. Premierline. Those which are providing quotations have increased their premiums significantly due to flood risk (**56% increase in 5 years** and one company quoting an additional £500+ to add flood risk insurance). If this development proceeds, **this will exacerbate the situation** and it is questionable whether properties within the development site will even be able to obtain insurance.

When a flooding incident happens, nobody asks why the developer/builder built the houses there, they ask why the politicians and the planners allowed them to build there. A builder's liability is gone in 5 years but the decision of council and planners lasts for decades if not centuries.

Culverting of the watercourse to create access to the development.

Under policy FLD4 of PPS 15, culverting of a watercourse is only allowed in exceptional circumstances such as if it is required for access to a development. The proposed access to the site is via Willowfield Drive where there is currently no access. The current access to the site is via Cromore Rd. **Therefore, under policy FLD4 the watercourse should not be culverted for this development.** In Section 1.10 of Addendum 2 it is stated the proposed culverting is required to provide a safe vehicular access to the site due to the presence of the railway line on the current access from Cromore Road making it unsafe. There are technical solutions to making the access from Cromore Road safe.

The storm drainage system serving Willowfield Drive discharges to the watercourse in the stretch that it is proposed to culvert. **The impact of the culvert on the drainage system doesn't appear to have been considered in either the planning application or the planning report.** This has implications including an increased risk of flooding within Willowfield Drive if the culvert backs up into the storm system or the storm drainage from Willowfield Drive is unable to be released due to flows within the culvert.

The schedule 6 consent issued by Rivers Agency on 25th June 2020 to discharge storm water and culvert the watercourse was valid for a period of 12 months and thus will have expired. Has this consent been renewed, or a new consent issued by Rivers Agency? **In addition, the consent issued in June 2020 was based on a culvert approximately 50 metres in length.** As the size of the culvert has since been amended this would potentially invalidate the above consent. **Rivers Agency also confirmed a Habitats Regulation Assessment had not been undertaken prior to issuing the aforementioned consent.** Is this a breach of the Conservation Regulations? Has an HRA been carried out on any renewal or reissuing of consent?

Creates a dangerous access to and from 48 Willowfield Drive.

Number 48 is currently at the end of Willowfield Drive where it is proposed to create the access to the site.

The proposed development involves: -

- the realigning of the kerb and thus reducing the width of the road outside Number 48.
- significant changes to the existing turning head arrangement at the access Number 48 (removing one side of it completely as well as realigning the kerb and regrading)
- the construction of a road across the existing watercourse beside the access to Number 48.
- Significant increase in traffic going to and from 32 dwellings.
- Construction of a wall 1.1 – 1.2 metre high (depending on what plan you look at) on the new access road.

These changes will have a serious impact on the access making it potentially extremely dangerous when entering or leaving number 48. Paragraph 8.43 of the planning report states the proposed changes have been assessed against appropriate standards and their use “will minimise any impact the proposed development may have on your access”. This appears to recognise there will be an impact on access to this property. It is unacceptable for there to be any impact on access to existing properties.

Inadequate and insufficient road infrastructure.

The new development will lead to a substantial increase in traffic through Willowfield Drive due to the construction of 32 houses.

Road infrastructure at Willowfield Drive is not suitable for this increase in traffic and will have a detrimental impact on the residents. None of the gardens facing onto Willowfield Drive are enclosed and thus the **increase in traffic is a threat to the health and safety of any young children** living in the area (seems to be a suggestion from some of the residents that it was a condition of planning that the front gardens should not be enclosed).

Willowfield Drive is not suitable for construction traffic.

Out of Character with all housing developments surrounding it.

Section 8.8 of the Planning Report acknowledges the current housing areas surrounding the site are predominantly bungalows (over 200). The construction of 31 two storey dwellings in the middle of an area totally dominated by bungalows means **it will be totally out of character**. The planning report refers to Cambridge Park as having two storey dwellings. However, given the distance of Cambridge Park from the site and the fact it is separated from the Willowfield areas by Atlantic Road makes it irrelevant to this application.

Section 8.9 states the proposed development would be a separate development to the existing developments. Given the only access to the development will be via Willowfield Drive means it cannot be considered a separate development from Willowfield Drive. In addition, the proposed properties will back onto Willowfield Drive, Willowfield Avenue, Willowfield Gardens and Willowfield Park.

Foul Sewage Arrangements

It is proposed to pump the foul effluent and connect it into the existing sewer at a manhole on the road at the front of number 48 Willowfield Drive. It is likely to be the same location as where the foul effluent from number 48 enters the foul sewer.

No detailed information has been provided regarding the site levels of the pumping main and the maximum volume of effluent to be pumped on any one occasion. Given it will be a pumped discharge it will clearly involve a significant volume of effluent on any one pumping cycle. There is a concern the proposal could restrict the flow of foul effluent from number 48 entering the manhole thus causing the effluent to back up in the drain serving the property.

There is also a concern that the effluent being pumped from the proposed development could also back up into the drain serving the property from the manhole where it enters the existing sewer. Both situations would clearly have an adverse impact on number 48 and those living in it.

The proposal involves the pumping main crossing the watercourse where it is proposed to culvert it. No information has been provided about the level of the pumping main at this location. Will it cross the river within the culvert or above it and if so how far above the culvert? **Has permission for the main crossing the watercourse been granted from Rivers Agency? Have Rivers Agency been consulted about this?**

There are potential obstruction issues and thus flooding issues with the main crossing the watercourse. As outlined already the area of the proposed culvert and the pumping main is shown by rivers agency as a flood plain in the future due to climate change. This clearly will impact upon the pumping main. **Are NIW content with such a situation given the obvious health, environmental and pollution issues such a situation would create? Has an article 161 application been submitted to and approved by NIW?**

A manhole is to be installed on the pumping main as it leaves the proposed development. Any blockages in the manhole **could result in the pollution of the watercourse** which of course is hydraulically linked to a designated watercourse.

Section 5 of the NIW consultation response returned to the Planning Portal on 29th July stated the receiving foul sewerage network had reached capacity. **It went onto say the public system cannot presently serve this development proposal without significant risk of environmental harm and public dis-amenity including pollution, flooding and detrimental impact on existing properties. This response has since been removed from the planning portal and section 5 amended with no explanation as to why.** (Original included.) The above comment from NIW is extremely concerning for the owners of the existing adjacent properties. In addition, was this impact assessed as part of the HRA conducted by SES?

Concerns during construction.

Potential pollution of waterways during construction.

Dirt and debris on Willowfield Drive from construction traffic.

Dust during the construction phase blowing onto the existing properties.

Alterations of turning head arrangement including the regrading and resurfacing will mean there is no vehicle access to or from my property.

Statutory Planning Consultation Response

Planning Application Reference:

Address:

Type of Application:

Application Classification: Change of Use:

Number of Units (if available):

Date Issued by Planning Portal:

Date of Return:

Overall Planning Application Recommendation

Based on the responses stated below, NI Water recommends that this planning application is:

1. Is comment necessary in relation to Water and Sewerage Services?

Wastewater Service

2. Is connection to public foul sewerage system required?

3. Receiving Wastewater Treatment Works:

3a. Status of receiving Wastewater Treatment Works:

4. Is the proposed development in close proximity of a Wastewater Treatment Works or Wastewater Pumping Station?



Statutory Planning Consultation Response

5. Is a public foul sewer in close proximity and available to serve this proposal?

FS-02B: For the reasons detailed below NI Water recommend that this application for planning approval should be Refused.

There is a public foul sewer within 20m of the proposed development boundary which cannot adequately service these proposals.

The receiving foul sewerage network has reached capacity. The public system cannot presently serve this development proposal without significant risk of environmental harm and public dis-amenity including pollution, flooding and detrimental impact on existing properties. NI Water plans to upgrade the sewerage system in this Drainage Area. While this remains subject to prioritisation and the availability of funding, NI Water is recommending connections to the system are curtailed.

The Applicant is advised to consult directly with NI Water (InfrastructurePlanning@niwater.com) to discuss current projected timescales to upgrade the wastewater system in this drainage area. Alternatively an Impact Assessment may be undertaken to ascertain whether an alternative drainage / treatment solution can be agreed. Upon the completion of which and subject to re-consultation, NI Water may reconsider its recommendation.

5a Is a public foul sewer traversing the development site?

No

Not Applicable

6. Is a connection to public surface system required?

Yes



Statutory Planning Consultation Response

6a. Is a public surface water sewer in close proximity and available to serve this proposal?

SS-02B: For the reasons detailed below NI Water recommend that this application for planning approval should be Refused.

There is a public surface water sewer within 20m of the proposed development boundary which cannot adequately service these proposals.

The receiving surface water network has reached capacity. The public system cannot presently serve this development proposal without significant risk of environmental harm and public dis-amenity including pollution, flooding and detrimental impact on existing properties. NI Water plans to upgrade the surface water system in this Drainage Area. While this remains subject to prioritisation and the availability of funding, NI Water is recommending connections to the surface water drainage system are curtailed.

The Applicant is advised to consult directly with NI Water (InfrastructurePlanning@niwater.com) to discuss current projected timescales to upgrade the surface water system in this drainage area. Alternatively an Impact Assessment may be undertaken to ascertain whether an alternative drainage solution can be agreed. Upon the completion of which and subject to re-consultation, NI Water may reconsider its recommendation.

6b. Is a public surface water sewer traversing the development site?

No

Not Applicable

Water Supply Service

7. Is connection to public water supply required?

Yes

7a. Is a public water supply in close proximity and available to serve this proposal?

WS-01: There is a public water main within 20m of the proposed development boundary which can adequately service these proposals.

An application to NI Water is required to obtain approval to connect.

The above information will only be valid for a maximum period of 18 months from the date of this consultation response. Should Planning Approval not be granted within this period, a re-consultation will be required to review public water supply availability and to confirm NI Water's recommendation of this development proposal.



Statutory Planning Consultation Response

7b. Is a public water supply traversing the development site? No

Not Applicable

Site Specific Comments

Trade Effluent:	Not applicable.
Grease Trap Installation:	Not applicable.
Oil/Petrol Chemical Interceptor Installation:	Not applicable.

NI Water would make the following site specific additional comments:

Standard Planning Conditions

Planning Authority should refer to the following Standard Planning Conditions:

No development shall be commenced until a Sewer Adoption Agreement has been authorised by NI Water to permit a connection
A formal water / sewer connection application must be made for all developments [prior to occupation], including those where it
All services within the development should be laid underground.
Development shall not be occupied until the foul water drainage works on-site and off-site have been submitted to and approved by the relevant authority and constructed by the developer in line with approved design. REASON: In the interest of public health.
Development shall not be occupied until the surface water drainage works on-site and off-site have been submitted, approved and constructed by developer and the relevant authority. REASON: To safeguard the site and adjacent land against flooding and standing water.
Statutory water regulations are in force, which are designed to protect public water supplies against contamination, undue consumption and misuse. All internal plumbing installation must comply with the current Water Supply (Water Fittings) Regulations (Northern Ireland). Applicants should contact NI Water's Water Fittings Regulations team via waterline@niwater.com if they have any queries.



Statutory Planning Consultation Response

Additional Informatives

To ensure compliance with the Water and Sewerage Service (NI) Order 2006 (as amended Water and Sewerage Services Act (Northern Ireland) 2016), consultation with NI Water is essential at an early design stage with regard to the following matters;

Foul and Surface Sewerage
Requirements:

Where the sewers within the proposal serves two or more properties the developer must enter into an Agreement for Adoption of Sewers under Article 161 of the above Order. Sewers must be designed to meet the criteria as set out in the current Sewers for Adoption Northern Ireland specification. A connection to the public sewer will not be permitted until the Article 161 Agreement has been authorised by NI Water.

Water Supply Requirements:

If your proposal is for more than 1 property it may be eligible for the provision of a public watermain. Single property if accessed directly from a public road / area. For multiple properties each must have an individual supply direct from the proposed public watermain under Article 76 of the above order.

Septic Tank Emptying:

For single properties where there is no sewer NI Water provide an annual septic tank desludge/emptying service. Further information is available by contacting Waterline on 03457 448800 or waterline@niwater.com . Desludge/emptying request is also available via NIW Self Service Portal at <https://selfservice.niwater.com/DesludgeOpen>

The following may also apply:

Upon receipt of this statutory consultation and to discuss any areas of concern, the applicant is advised to contact Waterline on 03457 440088 or waterline@niwater.com. Alternatively, guidance notes and application forms are available to download from NI Water website at <https://www.niwater.com>

If during the course of developing the site the developer uncovers a pipe not previously evident, NI Water should be contacted immediately via Waterline 03457 440088. NI Water will carry out an investigation, and, provide guidance and direction in respect of any necessary measures to deal with this issue.

Overall Planning Application Recommendation

Based on the responses stated below, NI Water recommends that this planning application is:

Approved with Standard Planning Conditions and response specific conditions.

Issued on behalf of NI Water to:

Causeway Coast and Glens Borough Council

Issued by:

Robert O'Hare

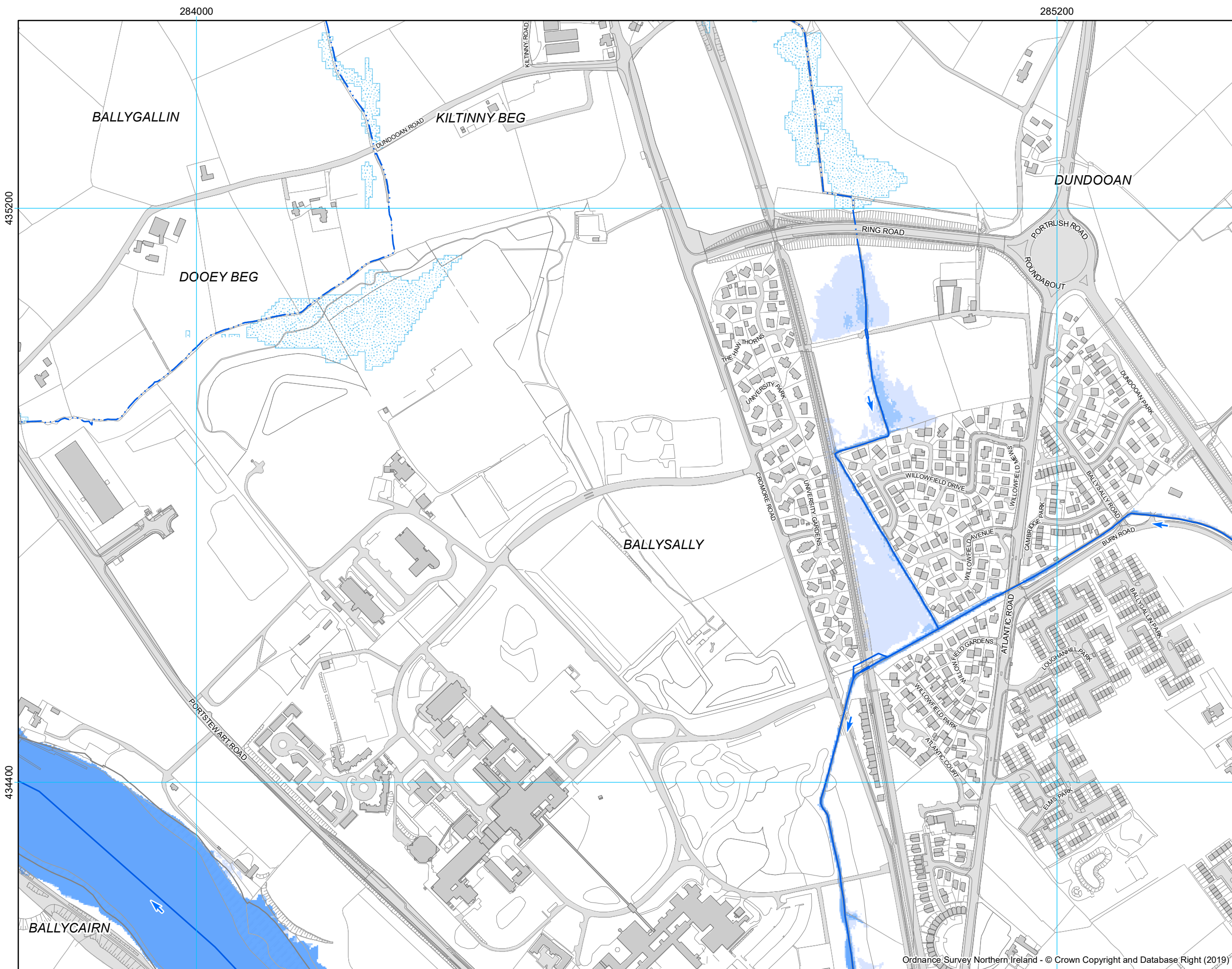
Email:

InfrastructurePlanning@niwater.com

Telephone Number:

03457 440088

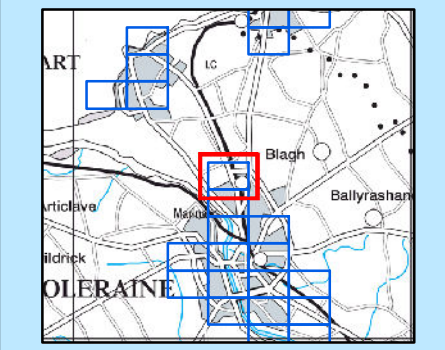




Flood Hazard Extent

All Probabilities

Map Type: FLOOD HAZARD
 Source: RIVER
 Epoch: PRESENT DAY



Scale 1:5,000 when plotted at A3

River Model Status

- Modelled in Detail
- - - Modelled Strategically
- - - Unmodelled
- Flow Direction

"Detailed" Hazard Data

- 10% AEP Flood Extent (1 in 10 or greater chance in any given year)
- 1% AEP Flood Extent (1 in 100 or greater chance in any given year)
- 0.1% AEP Flood Extent (1 in 1000 or greater chance in any given year)

Flood Defence Structures

Standard of Protection (SoP)

- SoP < 50 yrs
- 50yrs <= SoP < 75 yrs
- 75yrs <= SoP < 100 yrs
- 100yrs <= SoP

"Indicative" Hazard Data

- **"Indicative" Floodplain (1 in 100yrs)

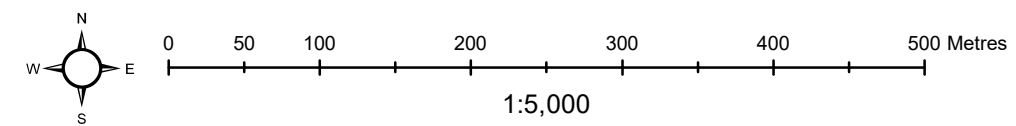
* Estimated using strategic flood models. Should be used only to identify general areas prone to flooding and not to determine the hazard to individual properties.

Coordinate System: Irish Grid.
 Coordinates in metres.
 Heights in metres above MSL Belfast.

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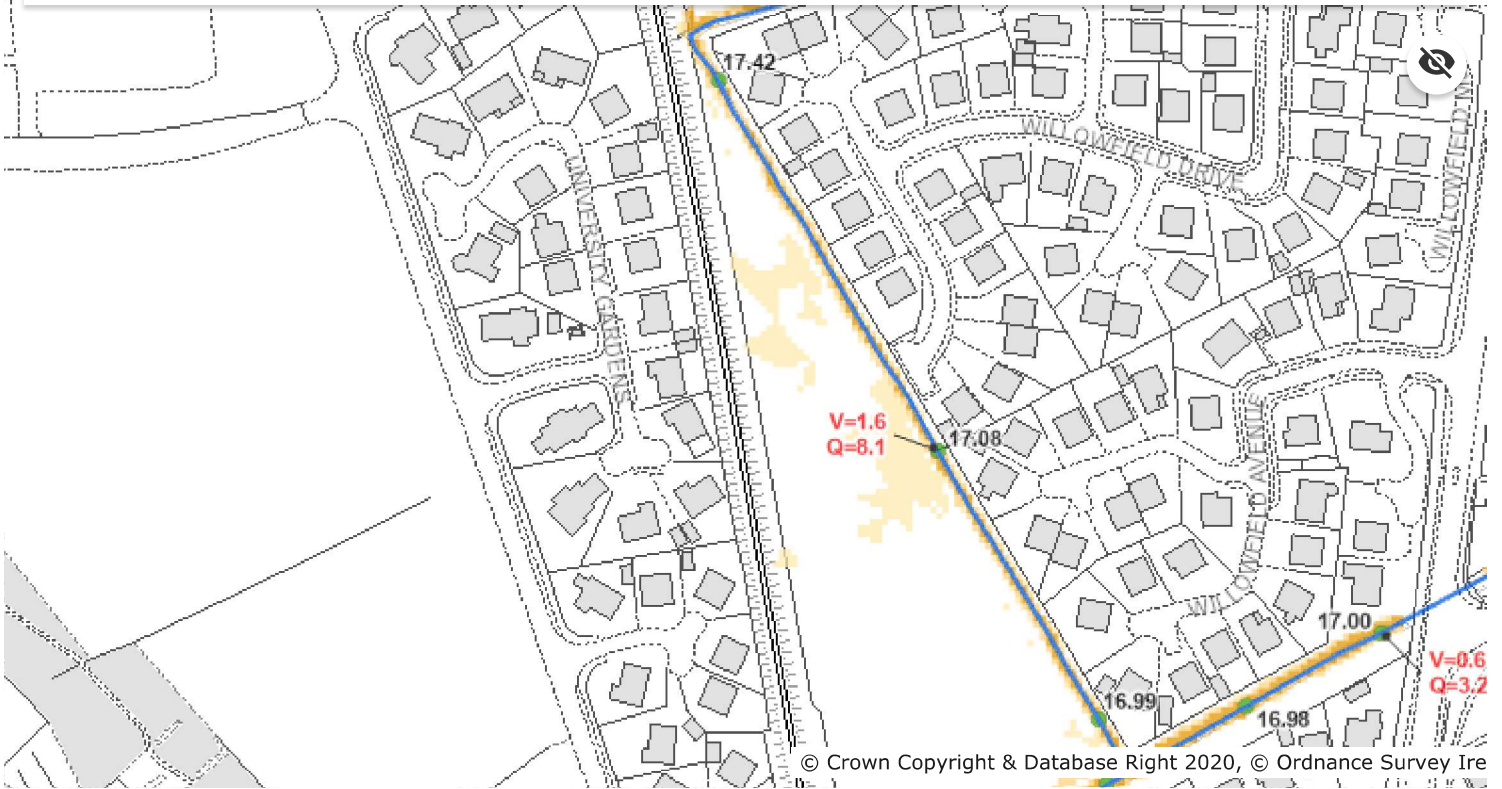


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