



1. Vehicular access from Frome Rd
2. Potential connections to existing areas
3. Proposed pedestrian / cycle crossing
4. 1FE Primary School with associated sports provision - Site area 2.0 ha (4.94 acres)
5. Landscape buffer
6. Green links along existing footpath
7. Surface water attenuation features
8. Land retained for agricultural use

Above: Concept layout.

Proposal area

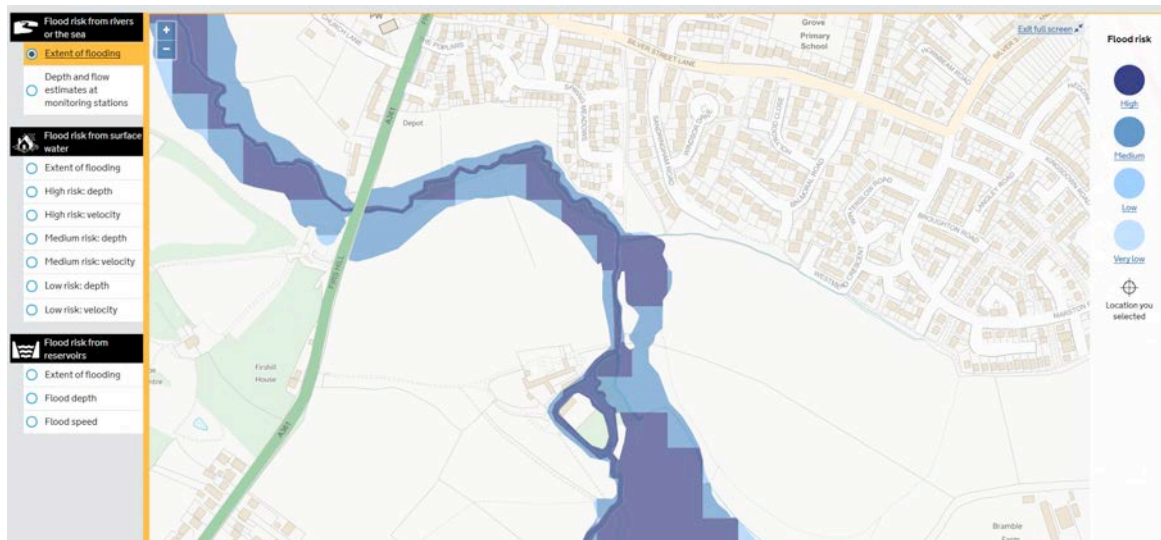
This places access across level two and three flood plains and places a primary school directly atop the level three plain. The water capture features are situated at the top of a 2-3 metre slope with no mitigation measures at the foot.

The following assessments have been recently published by the United Kingdom Government. They have been compiled by combining data from the Environment Agency and Wiltshire Council. The original maps can be accessed here:

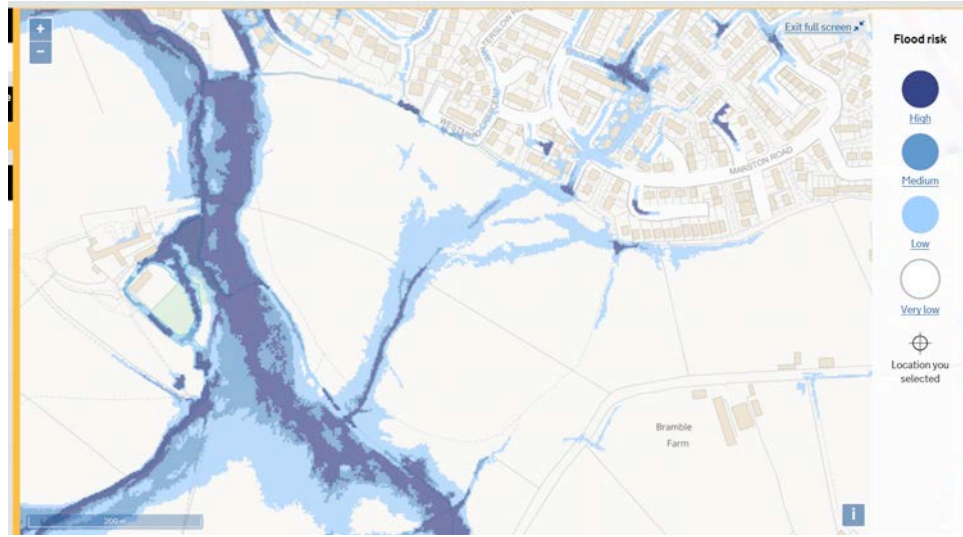
<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>,

The charts clearly show significant effects, with the acknowledged potential of flood flow onto the site from the current built form, an effect which has not been addressed in any plan or statement.

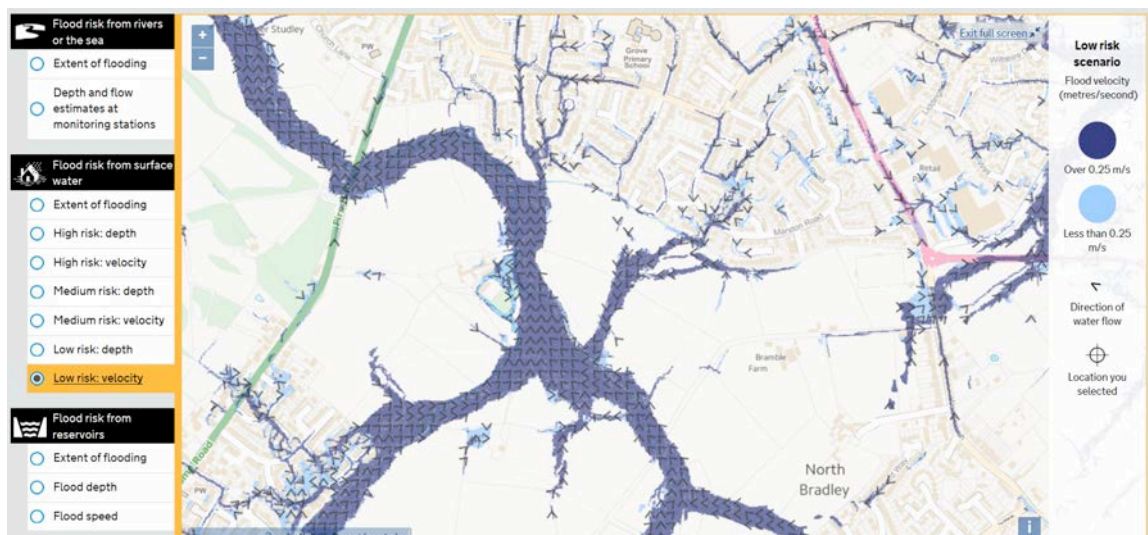
Watercourse flooding



Surface water flooding



Water flow projections



This projection speaks crucially to the issue of source of surface water flow as potential inundation is clearly shown to be from both North and South where surface water drains currently empty in to both ditch and watercourse.

Combined flood zones



Clearly the issue of surface water cannot have been addressed as flooding currently takes place at the foot of the slope, and the addition of 180 homes with foot and vehicular access can only exacerbate this without a dedicated solution at the foot of the slope. This area regularly floods and impacts on current dwellings as has been shown in submitted photographic evidence (ref. my initial submission to the Inspector and to the Consultation). Positioning such attenuation would necessitate the re-routing of a 46cm ductile iron water main, since the main itself has a legislated 6m permanent access required on either side. (Water main map in appendix)

These flood charts have been hitherto unavailable and therefore not submitted for consideration by anyone other than Wiltshire Council.

2) Heritage assets

In advance of the final acceptance of the plan, Wiltshire Council commissioned an independent Report focussing on six sites within the proposed set of site allocations. This report was only mentioned in the final 8500 page proposal on which Councillors voted as a hyperlink in 'additional documents' and in the final documentation in which the conclusions for H2.6 were mis-quoted (the determination quoted relates to site H2.2 section 14.13). This document was specifically referred to in answers to written questions presented to Cabinet in respect of the meeting in July 2018 (Reply from Cllr. Sturgis dated 3rd July 2018) indicating the cognisance of both the report and its unequivocal findings in advance of the acceptance of the proposal.

The document was created and presented by LUC (Land use consultants) who are a consultancy firm with over 50 years international experience and who are named consultants for English Heritage and Natural England amongst others, and is dated March 2018.

This report concludes with a detailed map clearly delineating the areas which, in their independent, highly experienced and professional opinion may and may not be developed. I have gone to the time and expense of reproducing this entire document for the record and would suggest as a brisk start to cast an eye over the map on page 62, this shows, without linguistic tap-dancing, the true conclusion of the independent report. Principal amongst my reasons for this are that the Independent, Publicly-funded and impartial report is only represented by a single mis-quote and hyperlink in the 8500 page document, whereas the developer-funded naturally self-interested report is reproduced in full in the documents to the Inspector.

I believe that the first document deserves a full and unfiltered study.

I would like to draw the attention of the Inspector to sections (1.17-1.20, 7.24-7.28, 7.33-7.37) in particular and the entirety of the section dedicated to H2.6 from pp 56-62.

The developer-funded rebuttal not only declines to address the legislative aspects of the initial report, but spends the majority of its duration picking at a single element not central to the initial report.

In particular the report refers to the recently built solar farm (7.28). The Officer reporting on the application (15/04570/FUL) concluded that:

“With regards to cumulative impact, the Local Planning Authority are currently assessing other applications for solar farms within the immediate vicinity, however as this application was submitted first and has no objections from consultee responses, it is the other applications for solar farms would need to take into consideration the cumulative impact. CP29 is a policy in the CS which protects the character and identity of Southwick and North Bradley as separate communities. Integral to this is the preservation of the undeveloped countryside that lies between them.” (sic)

This site, along with H2.6 and proposals put forward will make a continuous link between the villages and town.

The officer concludes that the land has little value and that the impact is minimal.

“At a local level the development may be perceived as large when travelling along local footpaths especially between Southwick and North Bradley.”

In the appendix to this submission there are a small number of photographs showing the site before and after construction along with two photographs of the site, which according to the Officers report cannot be seen from anywhere other than a handful of named properties or nearby footpaths. These were taken from Trowbridge. These

images have not been submitted prior to this submission and damage confidence in the assessments provided by those Officers.

Previous to this submission the argument has been put forward that access to this site is either unacceptable or in breach of legislation. These can be seen in detail in both my submission made in September 2017 to the consultation and to this process (refs below) however a brief summary is that Cutting across the level 3 floodplain fails the NPPF sequential test and breaches Environment Agency direction. This cut-through from the A361 would also contravene the recommendations in the Wiltshire Council Habitats Regulation assessment in which the hedgerow bounding the Lambrok stream should be:

“protected and/or buffered”

In their response to the HAP, Natural England assert that this protection is insufficient and assert that the document and plan are not fit for purpose.

Further possible access has been proposed as “emergency” and itself cuts through a hedgerow adjudged in the 1997 Hedgerow Act as being Important and protected. Since the last submission of this evidence this status has been confirmed by DEFRA and cannot any longer be considered open for discussion. Additionally since the last submission, the Environment Agency has also confirmed that a further licence must be sought to cross the level two flood area associated with this hedgerow. These issues are compounded by a ‘ransom strip’ and issues related to protected species. Since the last submission it has emerged that no acceptable survey has been completed on this aspect but that the presence of protected species has been confirmed.

Current Notional plans suggest a road link to the main Frome Road, which is overloaded during peak times which would then argue for the permanent use of the “emergency” access. Bus services are sporadic, road links congested and the site is outside of the sustainable distance from the Railway Station. This station has limited links direct and, I believe, only two direct trains a day to London. Access to transport is limited and even foot access is represented by the footpath network over which much of the housing is to be built.

Finally, the aspect of access to this site through an existing breach in the hedgerow to the South of Southwick court, crossing a less threatening portion of the flood plain has been put forward to the Council and agents for the developer. This suggestion has been met with a stony silence exemplifying the lack of communication with Parish, Town and County Councillors along with Executive officers in the local Council and members of the general Public.

Conclusion

At the outset the entire site was adjudged to be of marginal sustainability. The quantity and severity of evidence arguing against any degree of sustainability has

mounted. At the same time the more sustainable portion of the site, the Western section which suffers no significant flood risk, has direct access to a major A road, and requires no special bridges, access or breaches in either legislation or County Policy, has been dropped. This portion is now earmarked as green space but has no footpath links to the surrounding villages. The Eastern portion identified for development is an amenity space, grazing land and the site of four registered footpaths.

The part of the site to the East of the Lambrok stream, which floods, is bounded by level 2 and 3 flood plain and surface water inundation, is bounded by an ancient Parish boundary and for which access has been adjudged a threat to Grade 2* heritage assets has been retained. This does not even begin to address the breaches in core and secondary policy engendered by what the HIA report describes as creeping urbanisation. Wiltshire Council has been criticised by Natural England for these breaches in policy which are recognised as an ongoing issue (referenced in my initial submission to the Inspector) and to select the portion of the site which clearly focuses on these ongoing breaches is baffling.

Much of the rationale put forward for the rejection of considered sites is dwarfed by the scope and scale of the evidence presented in opposition to this proposal.

The argument for additional housing for this housing market area has been made, along with a determination that dwellings should precede infrastructure (this strategy being clearly laid out by the Cabinet member for planning in the June 2017 Cabinet meeting and available on the video minute). The failure to bring forward the significant development of properties on the Ashton Park estate, brought about principally by the lack of research and preparation before permission was granted has led to the current impasse.

The inclusion of this site appears to be a knee-jerk response to more suitable sites, with faulty permissions, being unable to proceed. The quantity of dwellings proposed for this site has now been offset by granted permissions, within brown field and regeneration sites within the town and new build within the community area. This renders the loss of this protected, important and highly used amenity site unnecessary and pointless.

Graham Hill 21/2/19

Additional photographic submission

Site of Solar farm

Before:



From as closely as possible vantage point

After:



Before:



And again from the closest possible point.

After:



The horizon looking at the solar farm from Boundary Walk in Trowbridge:



Detail of the solar farm, again from Boundary Walk Trowbridge:



Map of water main as provided by Wessex Water



Land s/o Boundary Wlk 2

Trowbridge, Wilts

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WATERMANS	Public	Private
Public	---	---
Raw Water	---	---
Abandoned	---	---
Valves	X	Hydrant
	PRV	Meter
	M	
SEWERS	Public - Section 104 - Private	
Foul	---	---
Combined	---	---
Surface	---	---
Abandoned sewers	---	---
OTHER WESSEX PIPES		
Rising Mains	---	---
Effluent Disposal Main	---	---
Overflow	---	---
NON-WESSEX PIPES		
Private Rising Mains	---	---
Culverted Water Course	---	---
Highway Drain	---	---

Information in this plan is provided for identification purposes only. No warranty as to accuracy is given or implied. The precise route of pipe work may not exactly match that shown. Wessex Water does not accept liability for inaccuracies.

Sewers and lateral drains adopted by Wessex Water under the Water Industry Schemes for Adoption of Private Sewers Regulations 2011 are to be plotted over time and may not yet be shown.

In carrying out any works, you accept liability for the cost of any repairs to Wessex Water apparatus damaged as a result of your works. You are advised to commence excavations using hand tools only. Mechanical digging equipment should not be used until pipe work has been precisely located.

If you are considering any form of building works and pipe work is shown within the boundary of your property or a property to be purchased (or very close by) a surveyor should plot its exact positions prior to commencing works or purchase. Building over or near Wessex Water's apparatus is not normally permitted.

References and links

- Initial submission in full

https://cms.wiltshire.gov.uk/documents/s146766/Cabinet%20Question%203%20A%20copy%20of%20Mr%20Graham%20Hills%20representation%20refereed%20to%20within%20question_Redacted.pdf

- Combined surface and watercourse flooding assessment

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

- CASE OFFICER'S REPORT
15/04570/FUL

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321>

- Reply to written question to Cabinet containing link to HIA

<https://cms.wiltshire.gov.uk/documents/s146757/Cabinet%20Question%201%20Graham%20Hill%20Final%20020718.pdf>

- Agenda and minute to June 2017 Cabinet meeting

<https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CIId=141&MIId=11096&Ver=4>