

HEARING STATEMENT

SHROPSHIRE LOCAL PLAN INQUIRY

REGULATION 20 REPRESENTATION RELATING TO POLICY S18 WHITCHURCH PLACE PLAN AREA

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(*proposed Shropshire Local Plan housing allocation superimposed*)

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1. Introduction

- 1.1 The Planning Group Ltd ('TPG') acts for Mr Jeremy Thorpe who is the owner / promoter of a proposed residential site at Lighteach Road north-west of the centre of Prees (Whitchurch Place Plan area). The site is identified as PPW021a in Shropshire Councils Strategic Land Availability Assessment ('SLAA').
- 1.2 TPG unsuccessfully sought meetings with Shropshire Council to discuss our client's site during the SLAA process. Shropshire Council subsequently selected an alternative site which is referred to as PPW025 in the SLAA documentation and is located to the immediate east of our client's site (see plan in Appendix 1).
- 1.3 TPG objects on behalf of our client to the proposed allocation of site PPW025 under Policy S18 of the emerging Shropshire Local Plan (the Whitchurch Place Plan area). We consider that there are significant limitations with the site which call the robustness of this proposed allocation into question.
- 1.4 TPG made representations in favour of our client's site in the 'Regulation 19' plan which has no equivalent limitations. We understand that these representations will be taken into account.

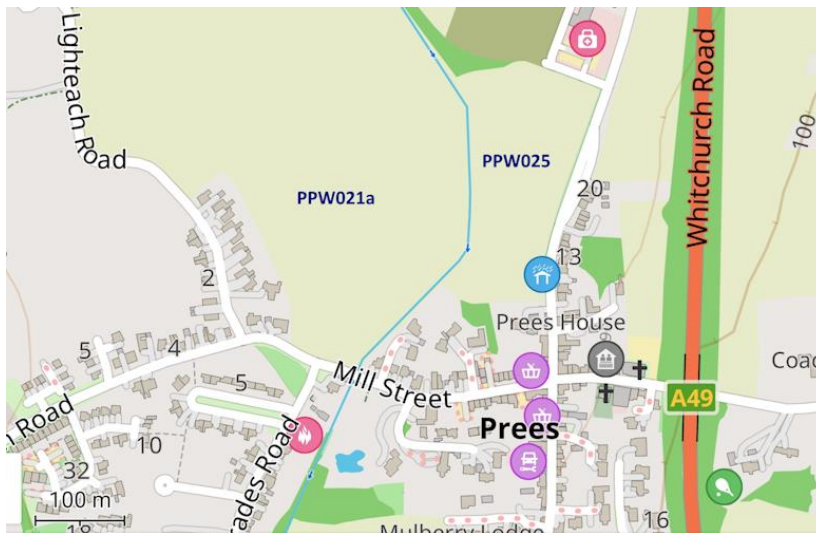


Figure 1 – Site Location (open-source mapping)

2. Site Area and Description

- 2.1 Prees is bisected by the A49. The main part of the village is to the west of this Trunk Road and fronts Mill Street / Church Street which runs east-west through the village. The former line of the A49 - now a short B-Road known as 'Whitchurch Road' links to the A49 Prees By-Pass to the north and south of the village.
- 2.2 The proposed 4.14-hectare allocation ('PPW025') is located to the immediate west of Whitchurch Road which runs on a west facing embankment in this location. It is north of the properties fronting Mill Street (see figure 1). The western boundary is defined by the floodplain of the Strine Brook. To the north is located the Prees medical centre.

- 2.3 The road embankment is up to 2m in height. Beyond this the site comprises a low-lying grass field in a gentle west-facing depression, the western part of which is within the flood plain. The site is shown on 1:25,000 Ordnance Survey mapping as having poorly drained areas to the north and south, with two ditches within the flood plain area, though these are not evident in recent satellite imagery.
- 2.4 A bus stop is located on Whitchurch Road at the southern end of the site. A post office / convenience store is located c50m to the south, with a further larger convenience store 130m to the south. The village hall is c130m south east and St Chads church and Prees C of E primary school are located approximately 400m to the east, on the opposite side of an underpass beneath the A49.
- 2.5 A number of listed buildings are located to the south and east of the site. The site's southern boundary adjoins the Prees Conservation Area.

3. The proposed allocation

- 3.1 The indicative layout plan shows 28 homes with 8 semis and the remainder detached. An access off Whitchurch Road at the middle of the site would link to a road running along the site's western boundary. This creates a frontage for west facing homes and provides access to phase 2 of the development to the north. This does not form part of the currently proposed allocation but comprises 8 dwellings, a nursing home and a church. No significant areas of public open space or landscaping / biodiversity are evident.
- 3.2 If it is accepted that the layout plan provided for the Local Plan is indicative only and may be subject to change at the planning application stage. However, it is noted that the layout is very similar to that shown for the 2014 outline planning application. Given the significant geographical constraints of the site it is considered that the scope for any substantial layout changes is limited for this number of dwellings.

4. Planning History

- 4.1 An outline planning application for 'Erection of 31 Dwellings including Provision of Access' at the site was submitted on behalf of Hawk Homes Ltd in July 2014 (ref: 14/03511/OUT).
- 4.2 A further outline application relating to land to the immediate north was submitted at the same time: 'Outline application (access for approval) for the erection 70 bed care home; church and eight Dwellings (14/03620/OUT).
- 4.3 Both applications were withdrawn in January 2016. File correspondence suggests that this was due to an unresolved objection from the Environment Agency, who were copied into the withdrawal email (see section 5).
- 4.4 There is no indication from the Council's online records of any attempt to re-submit either application in the subsequent 8 years.

5. Our Position

5.1 The Council considers that PPW025 is sustainable and is capable of delivering the number of houses proposed for allocation in a policy compliant way.

5.2 We disagree and consider that:

- There are significant doubts that the number of homes proposed can be delivered in practice due to major environmental and access constraints within and around the site
- There are significant doubts that policy compliant levels of public open space and biodiversity can be achieved within the area of the proposed allocation.

5.3 We acknowledge the outline scoring criteria used for site allocation as listed in the Sustainability Appraisal and Site Assessment Environmental Report by Shropshire Council dated July 2020. These can be summarised as:

- Proximity to environmental designations and buffer zones
- Access to green space and sports / play areas
- Tree preservation orders
- Proximity to infrastructure (surgery / school / sports facility etc)
- Affects best and most versatile land
- Source protection zone
- Brownfield
- Within flood zone
- Within / affects Conservation Area / heritage asset or buffer zone
- Landscaper sensitivity to accommodate residential

Note: Our clients site scored more highly in the Council's assessment matrix.

5.4 However, we consider that other more detailed development management criteria including 'Design and Access' are equally important. Only when these are factored in will a true indicator of sustainability be achieved. This includes:

- Achievability of vehicular and pedestrian access,
- public transport,
- ground levels,
- contamination,
- spatial relationship to settlement centre,
- availability of mains utilities and telecommunications services,
- spatial relationship to surrounding business uses / existing residential property
- presence of established vegetation / screening landforms / structures
- ability to integrate green space / biodiversity within the site
- ability in practice to mitigate environmental concerns

Section 7 below contains an assessment of these criteria.

Other considerations affecting policy S18

- 5.5 We note that the updated methodology for calculating levels of housing provision in the new NPPF may lead to an expectation for increased housing provision across Shropshire. This may have implications for most proposed allocations, including at Prees.
- 5.6 We also note that greater emphasis is placed on the ‘duty to cooperate’ in the new NPPF. We consider that this may lead to increased expectations for additional housing provision to cater for overspill from the West Midlands Conurbation. Though Prees is geographically separated from the edge of the Conurbation, ‘knock-on effects’ from this consideration may in future be expected across the county.
- 5.7 Additionally we note that there has been a significant reliance on windfall housing to offset the need for site specific allocations. However, assumed windfall levels have not always been delivered in practice in Shropshire. We understand that this is matter scheduled to be assessed at another hearing of the Inquiry.
- 5.8 It is possible that the above considerations could act together to exert upward pressure on housing targets and to demand increased evidence of deliverability within the timescale of the emerging plan.
- 5.9 Any allocations where there is a risk that the full level of housing may not be deliverable in practice may not be robust in the above context. We consider that the Council’s proposed allocation at Prees (PPW025) is likely to fall within this category. The succeeding section provides evidence in support of this conclusion.

6. Environmental Appraisal

6.1 Flood Risk

- 6.1.1 The 1:25,000 Ordnance Survey map shows the site as low-lying with cartographic signs indicating poor drainage in the north and south. The western part is identified as within the flood plain of the Strine Brook on the Environment Agency’s flood maps.
- 6.1.2 Topographically higher land to the north, south and east drains towards this area and the Strine Brook which has a narrow outlet to the south due to the presence of ridges of higher land to the east and west (see appendix 2 – 2014 topographic survey). The drainage of the brook is further restricted by a culvert which passes beneath Mill Street.
- 6.1.3 The 2014 outline housing application was accompanied by a Flood Risk Assessment by Woodsyde Developments Ltd which concludes:
- i. The proposed development will not be affected by current or future flooding from any source. Appropriate additional cut-off and land drains will be provided to receive any potential overland flooding. The highest point of the site cannot be subject to flooding. The site falls to the north east and the existing watercourse outfall. The levels here are*

approximately 90.6m, whereas the site typically sits at levels in the region of 85.2m. The development will not increase flood risk elsewhere, with the restriction of surface water run-off at Greenfield rates. The measures proposed to deal with the effects and risks are appropriate, for example using an attenuation-systems, soakaways, permeable paving and cutoff/ land drainage where possible.

- ii. It is considered that the exception test has been met as the majority of the site and certainly the proposed built form of the site is in Flood Zone 1 and that any issues related to the area shown in Flood Zone 3 has been dealt with and mitigated. The site will benefit from soakaways and/or an attenuation system for the surface water drainage with controlled discharge to existing site outfall.*
- iii. Other origins of flooding have also been assessed and it has been found that there will be no increase in risk of flooding from land, groundwater or sewers as a result of this development. There are no anticipated negative social, economic or environmental impacts which would result from the development of the site provided mitigation measures outlined in Section 5 are adhered to.*
- iv. The proposed development will ensure that the 1 in 100 year + 30% climate change flows will be attenuated on site. The surface water drainage will drain to soakaways and/or an attenuation system within the site. Permeable paving, rainwater butts, rainwater harvesting, cut-off drains and land drainage will be provided where necessary to ensure Sustainable Drainage Techniques. Potential additional storage capacity will be provided within the watercourse, which is within the Flood Zone 3 area.*
- v. New foul water sewers will be constructed in line with Sewers for Adoption 7th Edition and an application for a Section 106 agreement will be made where applicable. Sustainable Drainage Systems will be utilised as where ground conditions allow and this will be incorporated at the detailed design stage.*

6.1.4 The assessment therefore finds that the development is compliant with national policies and guidance and a sequential test is not required. This is because the building footprint would avoid the flood plain and appropriate drainage measures and flood mitigation can be provided.

6.1.5 However, the Environment Agency advised that their flood maps should not be relied upon for the proposed development and more detailed flood modelling should be undertaken. They also raised concerns about the potential for blockage to the culvert under Mill Street and associated backing up of flood water towards the site. No Environment Agency correspondence is however displaying on the Council's online planning register.

6.1.6 A hydrological modelling technical note by ESI was subsequently submitted in May 2015. This finds that the Environment Agency's flood map under-estimates the potential area affected by flooding which encroaches further to the east within the proposed site (see appendix 3 and figure 2 below). The report concludes:

- i. The Strine Brook at the proposed Site has been modelled using a 1D steady state model. The modelling has used predicted peak flows for 20, 100, 100 *climate change and 1000 year return periods and included the Mill Street culvert downstream of the Site. Partial blockage of the culvert was also modelled for 20% and 50% blockage but could not be modelled for 80% blockage due to model instability. The flood levels produced by the modelling have been used to map the extent of flooding in the Site. The modelling shows that predicted flood extents encroach upon the proposed development boundary. but that most of the development site remains above the modelled flood extent for all scenarios modelled. Potential mitigation options are proposed that may allow the development to be outside of the predicted flood extent. These require further examination and modelling to assess their feasibility.

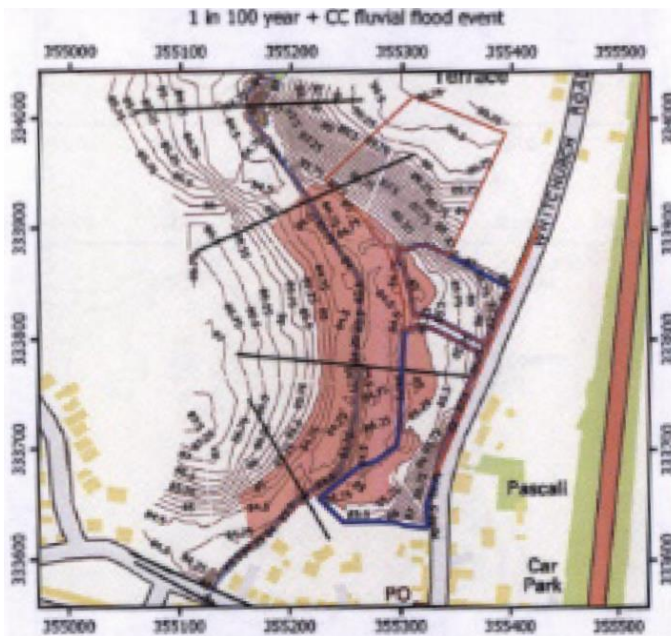


Figure 2 – Extract from 2014 hydrological modelling report showing 1 in 100 plus climate change flood area (pink/brown shading). Site edged blue

6.1.7 The potential mitigation options are described in the report as follows:

- i. As the flood extent encroaches on the proposed development boundary, mitigation measures should be considered to protect the development from flood risk. Without increasing flood risk elsewhere. These require proper investigation, and in some cases further modelling, but options could include:
- Developing only those parts of the site shown to be above the 100 + climate change flood level.
 - Raising the development above the flood levels indicated, and providing a compensatory volume of flood storage by reducing levels on the opposite bank.
 - Increasing the capacity of the Culvert (though this may have a result of increasing peak flows downstream)
- ii. It is clear that there is a risk of raised flood levels resulting from partial blockage of the culvert an assessment should be made regarding whether a trash screen is required at

this location and, it so. it should be designed to minimise the risk of blockage and facilitate cleaning Further details on risk assessment and screen design can be found in guidance documents produced by CIRIA4 and the EAs Consideration should also be given to providing regular maintenance and an alarm system to warn of excessive water levels upstream of the culvert.

6.1.8 It is evident from the subsequent withdrawal of both outline the applications that this conclusion was not accepted by the Environment Agency, who were copied into the withdrawal notification. This is understandable as the recommended mitigation options may not be deliverable in practice and have the following significant consequences for the development:

- They suggest the need for further modelling in some cases, raising questions about the reliability of the conclusions (and more so now – 7 years on);
- They suggest the need for major engineering works to raise levels within the site, with corresponding potential requirements for compensatory flood storage;
- They suggest the need to rely on third party land not under the control of the developer for flood mitigation (including our client’s land);
- They suggest the need for significant and costly drainage management measures within the site, potentially affecting profitability / viability;
- They suggest the need for major engineering works to increase the capacity of the culvert under Mill Street. This may not be achievable given the potential cost, the level of disruption to the village and the proximity to two residential dwellings;
- They leave significant doubt as to the effects of culvert blockage as the hydraulic model was not able to model the 80% blockage scenario;
- They imply the possible need for the developer to fund a drainage maintenance regime for the Strine Brook, including land outside the developer’s control;
- They suggest the possible need to reduce the development footprint, affecting housing numbers and potential viability;
- They suggest that the properties proposed to front the spine road on the western side of the development may not have safe access during a 1 in 100 plus climate change flood event and/or a culvert blockage incident.

6.1.9 As noted above, the Flood Risk Assessment concludes that a sequential test appraisal is not necessary as the development is not within the flood plain and appropriate mitigation is available. The subsequent hydrological modelling report indicates that this is clearly not the case. Otherwise, the Environment Agency would not have maintained its objection and the development would have been expected to progress, rather than being withdrawn.

6.1.10 There is no indication that any further evidence has been submitted more recently in support of the proposed Local Plan allocation to address these significant issues. It is considered therefore that the site clearly now meets the requirements for a Sequential Test under the Flood Risk and Coastal Change Practice Guidance.

6.1.11 The Guidance indicates that ‘Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- Within medium risk areas; and
- Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.

6.1.12 The Guidance continues that in plan making ‘The Sequential Test needs to be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk, both now and in the future’. However, the test will not need to be applied where ‘The site has been allocated for development and subject to the test at the plan making stage’ (paragraph 27).

6.1.13 We consider that it is critical to apply the test at the plan-making stage when our client’s site provides a clear alternative option which can be developed wholly outside of the flood plain. To wait until the planning application stage would amount to predetermination and would potentially be open to challenge.

6.1.14 The Practice Guidance also requires the ‘Exceptions Test’ to be applied for development within flood risk areas. This requires that development which has to be in such areas:

- ‘Will provide wider sustainability benefits to the community that outweigh flood risk’; and
- ‘The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall’ (Paragraph 031).

6.1.15 We consider that any public benefits delivered by the proposed allocation are significantly and demonstrably less than for our client’s site, which proposes substantial public open space and biodiversity gains amongst other matters.

6.1.16 In conclusion, it is surprising that Shropshire Council continues to support the proposed allocation in the context of the significant drainage issues above. The 2015 hydrological modelling indicates that a material proportion of the development is located within the 1:100 year plus climate change flood plain and those areas which are not within the flood plain are affected by it, due to access safety considerations.

6.1.17 The Environment Agency’s objection to the 2014 application and its subsequent withdrawal indicates by definition that unresolved flood risk issues remain. A responsible authority should therefore apply the Sequential Test and Exceptions Test in accordance with the Practice Guidance. If this is done then the only conclusion is that there is an alternative site which does not raise significant flood risk issues and would offer greater potential for public benefits.

6.2 Engineering / Access

6.2.1 The eastern boundary of the site is formed by a 2m high embankment adjoining Whitchurch Road. Geological mapping confirms that the road and site are located on fluvio-glacial sand deposits (1:50,000 British Geological Survey map for Wem area – solid and drift). These drift deposits are known to be structurally sound, except when in wet locations and on steeper

slopes. Structural integrity can be further compromised if the sand deposit has a higher silt content as this increases moisture retention, thereby weakening resistance to ground movement ('shear strength').

6.2.2 Visual inspection of the highway embankment, the road and the adjoining pavement suggest that in the main the embankment is structurally sound at present. There is no evidence of ground movement, or the need for repeated haunching / re-patching, though the road does appear to have been surface dressed in the recent past. It is considered that trees planted at the base of the embankment are likely to have helped with embankment stability by drawing water from the ground and from the stabilizing effect of the root systems.

6.2.3 However, there is evidence of localised ground movement / embankment instability in the area where the trees are absent, at the bus stop at the southern end of the site (see figure 3). This can be difficult and costly to rectify once it becomes established.



Figure 3 – Recent instability on the highway embankment (see emergency fencing, area of falling fence behind bus shelter and re-patching of tarmac).

6.2.4 The indicative layout plan shows an access driveway in immediate proximity to the base of the embankment. It is likely that services would need to run along this. There is a concern that construction excavations and the passage of heavy machinery could damage the roots of trees currently stabilizing the embankment, with significant implications for these residences and potentially for the highway which sits c2m above. There does not appear to be sufficient space to provide acceptable root protection zones. In practice, the edge of the proposed houses fronting Whitchurch Road appears far too close to the base of the embankment.

6.2.5 The great proximity of these trees to the front facades of this proposed residential property could also lead to amenity concerns for these residents from shading, leaf fall, bird fouling, pest infestation and trees falling. This in turn may lead to pressure from residents to remove or significantly prune back these trees which also form an important visual amenity on a key gateway to the village. Whilst the layout plan is only indicative the physical constraints of the site mean that it is difficult to envisage a different layout.

6.2.6 The indicative layout plan also shows a conventional T-junction access at the middle of the site’s frontage with Whitchurch Road. This would not be achievable as the land is 2m below the highway. In practice a sizeable access ramp and a much wider junction turning radius are likely to be required to achieve a suitably safe gradient and junction configuration. This would require its own embankments extending into the site, materially reducing the development area to the north and south of the access road and potentially affecting the amenity of properties adjoining this ramp.

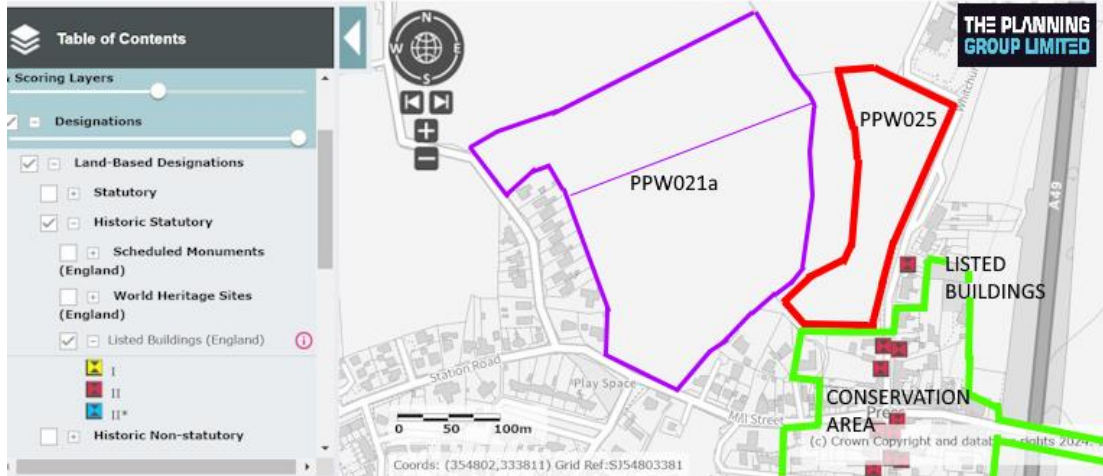


Figure 4 - Heritage

6.3 Heritage

6.3.1 The site is located to the immediate north of Prees Conservation Area and a number of listed buildings (see figure 4). One listed building is located to the south of the proposed site access on the east side of Whitchurch Road. A grouping of three listed buildings is located to the immediate south east of the site. The Council’s assessment matrix reports their Historic Environment Team as advising that a Heritage Statement is required to accompany any planning application. There is no record of this being submitted for the 2014 outline applications.

6.3.2 The NPPF requires that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)’ (Para 205). ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (208)’. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (209).



Figure 5 – view north towards site from the edge of the Conservation Area



Figure 6 – View of site from listed building south of proposed site access

- 6.3.2 Figures 5 and 6 show the current appearance of the site from the edge of the Conservation Area (Fig 5) and near the listed building to the south of the proposed site access (Fig 6).
- 6.3.3 The author worked as a Development Management Planner in Shropshire Council and its predecessor for 35 years until May 2024, including at Principal Planner grade for the past 14 years. Whilst qualified in planning rather than the historic environment he dealt with numerous schemes involving complex heritage matters and liaised routinely with the Council’s Historic Environment Team over this time.
- 6.3.4 In the author’s opinion the level of harm caused to the setting of the Conservation Area and nearest associated listed buildings would be equivalent to ‘less than substantial harm’ based on what heritage consultees have identified in similar contexts. This is because a view of attractive green countryside on a gateway out of the Conservation Area would be replaced by a view of new development with upstairs windows and roofs appearing at an unnatural level within the new street-scene.

6.3.5 With regard to the listed building near the proposed site access it is considered that there would be a significant adverse effect on the setting of this property. The property currently enjoys an attractive and expansive view of open countryside filtered by trees and this setting enhances the aesthetic value of the heritage asset. This setting would instead be replaced by a row of upstairs windows and roofs with associated potential overlooking issues and a site access which we consider is likely to require substantial engineering works.

6.3.6 The author considers that the scheme delivers insufficient benefits to meet the public benefit test set out by the NPPF. The scope for mitigation is limited due to the limited size and physical constraints of the site. It may not be practical to move the new houses further away from the road embankment or to materially reduce their height.

6.4 Public Open Space

6.4.1 The indicative layout does not include any public open space within the red line boundary. This is a requirement under the current SAMDev Policy MD2 and is carried forward in the emerging Shropshire Local Plan. There appears to be insufficient room to provide policy compliant levels of public open space within the allocation boundary. We consider that the only way this may be delivered is by including land between the site and the Strine Brook which does not form part of the proposed allocation and has therefore not been tested. Such land is located in the flood plain, divorced from the development site and could be waterlogged for significant periods (see appendix 2).

6.5 Ecology / Biodiversity Net Gain

6.5.1 The proposed allocation is classed as major development. The NPPF therefore requires an appropriate amount of biodiversity net gain to be delivered. There is insufficient space within the site to meet this expectation. As with public open space, the only place where it appears that this could be delivered is in the floodplain area between the site and the Strine Brook.

6.5.2 This area is not included in the proposed allocation site and it has not been demonstrated that appropriate biodiversity uplift and sympathetic management could be delivered in practice in this area. However, the council's ecology team has indicated that the area in question already forms part of the Council's 'Green Network' so including this area could potentially amount to 'double counting'.



Figure 7 – View showing attractive gateway effect when approaching from the north

6.6 Visual Amenity

6.6.1 The site is located on a principal gateway into Prees village from the A49. The current view is attractive, with open countryside to the west through a filtered line of trees and buildings with heritage merit to the west and south (Figure 7). The proposed development will potentially replace this with an ‘urban canyon’ effect with roof lines and upper storey windows extending at an unnatural elevation from the medical centre to the Conservation Area.

6.6.2 The access may also become a dominant and harmful urban feature given the need for a significant engineering operation to safely bridge the 2m fall into the site. Given the spatial limitations of the site it is doubtful that this potential adverse visual impact could be significantly mitigated.

6.7 Design

6.7.1 Whilst the proposed layout is indicative only, the constraints of the site restrict options for change. We consider however that many of the house frontages are too short and this will lead to loss of privacy / overlooking and vehicle manoeuvring issues. The proximity of east facing homes to the embankment and trees have already been noted. The semi-detached homes appear particularly constrained. We consider it doubtful that these design concerns could be successfully mitigated for the number of dwellings proposed given the significant physical and environmental constraints of the site.

8. **Conclusion**

8.1 Taking the above considerations into account we consider that there are fundamental limitations with the proposed allocation which render it unrobust and the site unsustainable:

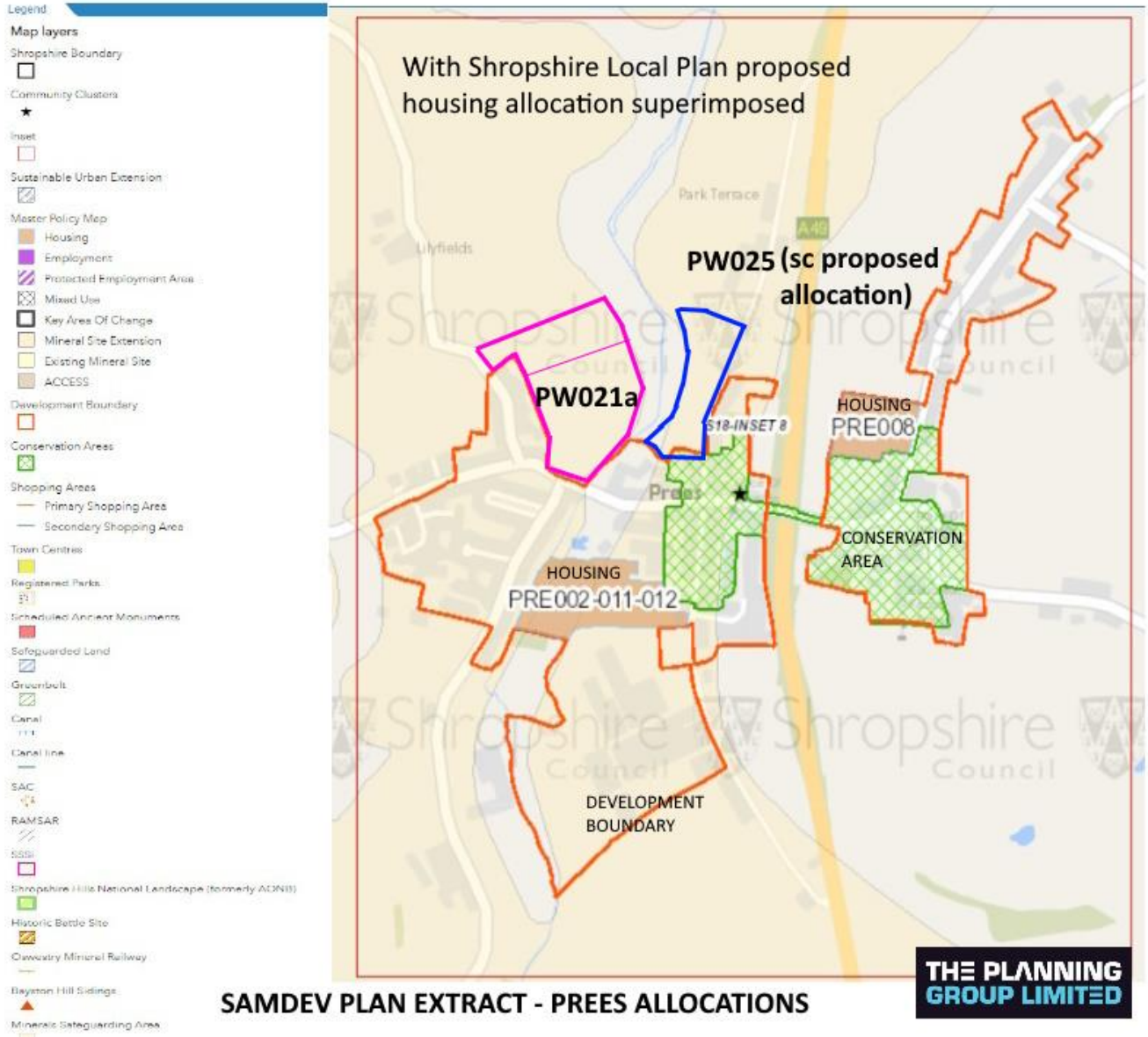
- i. Firstly, it has not been demonstrated that the site is sustainable and safe in terms of drainage and flood risk.

- ii. Secondly, there are concerns about the structural integrity of the highway embankment.
- iii. Thirdly, there are concerns about the harm to the setting of the Conservation Area and associated listed buildings.
- iv. Then there is insufficient space within the site to deliver policy compliant levels of public open space and biodiversity net gain.
- v. There is a significant adverse visual impact on a key gateway into the village which currently affords high quality views.
- vi. There are concerns about the indicative layout which appears cramped and contrived in many places, with limited opportunities for landscaping
- vii. The space for access appears unrealistic given the physical constraints and gradients of the site.

8.2 Taken together it is considered that the actual space available for built development within the site is substantially less than the amount proposed and shown in the indicative layout. This has implications for the amount of housing which can be delivered in practice, and for the robustness and sustainability and potential viability of the proposed allocation. We therefore object to the proposal to allocate site PPW025 under emerging policy S18 of the Shropshire Local Plan.

APPENDIX 1

SAMDEV PLAN EXTRACT WITH PROPOSED NEW PREES HOUSING ALLOCATION SUPERIMPOSED



APPENDIX 2

Client photos from 10th September 2024 showing poor drainage within the site following recent rain.



1) View towards my field in the distance showing higher elevation of ground from PW0025 site.



2) Area in PW0025 about 80 ft from the River Strine approx 1 foot deep.



3) same as 2)



4)Area in PW0025 approx 30ft from River
Strine over 1 foot deep, the whole area is flooded



5) same as 4)

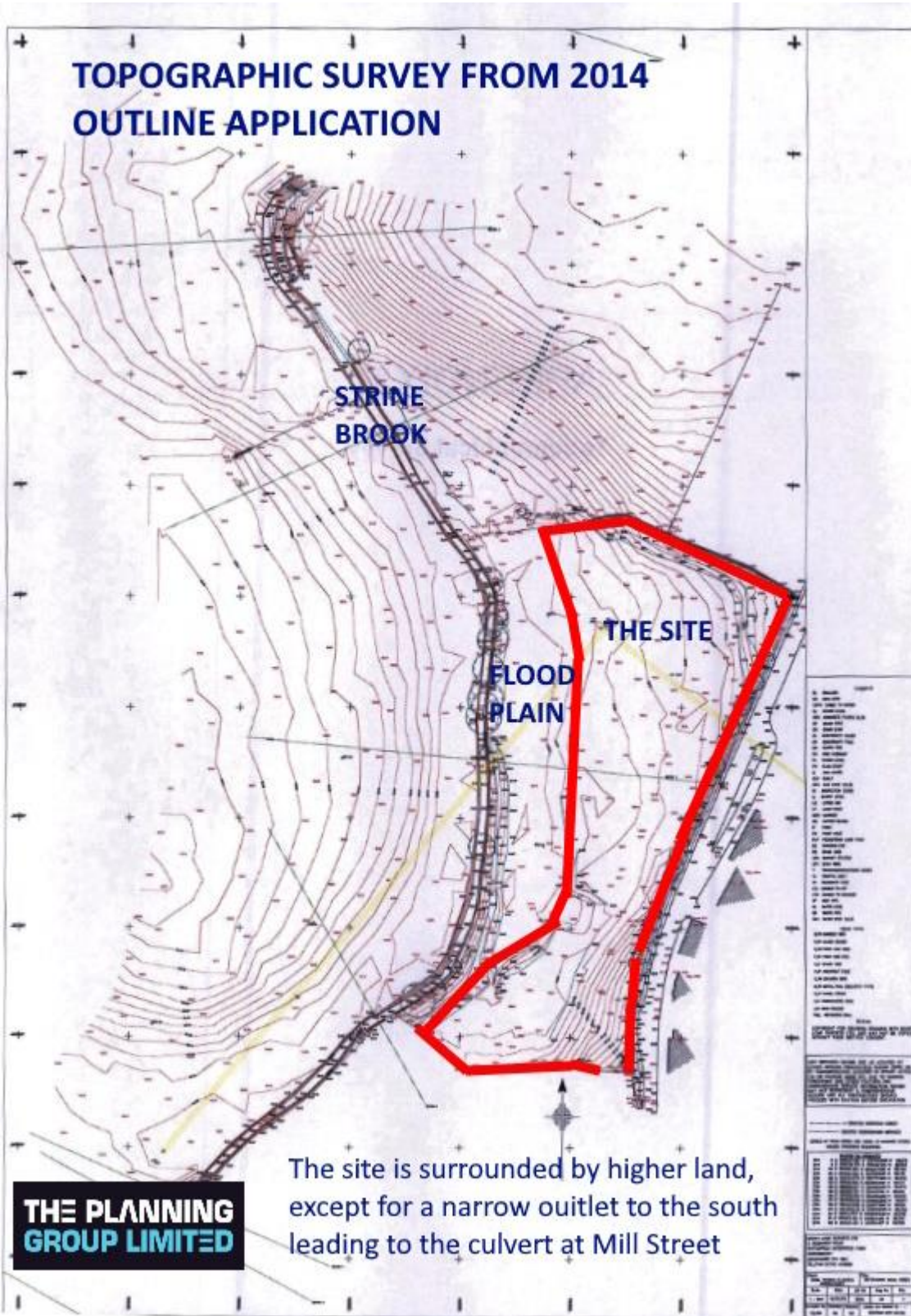


Same as 4 +5 area waterlogged



6) area showing PW0021a at an elevated height.

APPENDIX 3



APPENDIX 4 - 2014 Flood modelling overlain on indicative layout

