

I am Chief Flood Warden for Trowbridge and am writing because of serious concerns relating to the above application.

The application itself has already been rejected by the LPA, although consent was granted for access only at appeal inquiry.

The site borders Trowbridge which sits to its immediate North. The site is subject to both surface water and fluvial flooding, which impacts on the current built form at its Northern boundary. The site is on a gradient from South to North and bounded with watercourses to its Northern, Western and Southern boundaries. The application only provides attenuation features to its Southern boundary, in other words protecting only the proposed new build, and positioned at the top of a slope.

Furthermore, the application now includes the proposal to pump all surface water to the top of the slope, and thence into the Lambrok. The Lambrok is a designated main river which is the seat of fluvial flooding for the entire Western side of Trowbridge. The application seeks to increase the content of the Lambrok at the point at which it creates flood zones 1, 2, 3a & 3b, without any corresponding catchment or attenuation. This element of the “new” application exacerbates other issues.

My further concerns relate to a significant alteration to the plans which were discussed at Outline. At that point the access sought was for a road junction only. The site is to be accessed by a roadway approximately .5km followed by a bridge crossing a functional flood plain dealing with both surface water and fluvial flooding from the associated designated main river.

In the original speculative drawings there were no dimensions given for the bridge, however, the combined flood zones 2, 3a & 3b cover an area of approx. 100m in width (at least at the time of inquiry). Extrapolating from conditions set at Inquiry, it is possible to infer a height by examining the topographic survey submitted. This gives a maximum flood height of 1.2 metres, plus 600mm, plus 39% climate change allowance to the underside of the bridge. This points to a massive structure, with piles significantly intruding into the flood plain. To compensate for this, it was suggested that an attenuation feature or features be placed to the North to prevent additional surface water reaching the watercourse, and to provide a clear benefit in relation to fluvial flooding.

The latest, reserved matters application, not only omits any form of attenuation to the North of the proposed site, threatening the current built form, but ignores additional developments already underway. Furthermore, the length of the bridge has been reduced to around 50m, which means that it terminates **within** FZ3b. This is the only access road other than an access for emergency vehicles which has been mandated by Examination to be bollarded and locked at all times. The current proposal also places the curtilage of properties and associated infrastructure within FZ2.

If this alone were not concerning, when the current flood map for planning is interrogated, the proposal has clearly been framed with out-of-date data. The current fluvial flood zones are far more extensive than developers claim, and appear to include the entirety of one of the uphill attenuation features **within FZ3!**

All of these issues are very concerning, especially in view of the importance of the functional flood plain in respect of flooding along the watercourse which already occurs on an annual basis.

At Examination, the following conditions were laid down:

Para. 69:

- **Furthermore, both individual and cumulative effects on the Country Park must be taken into account.**

Para.70

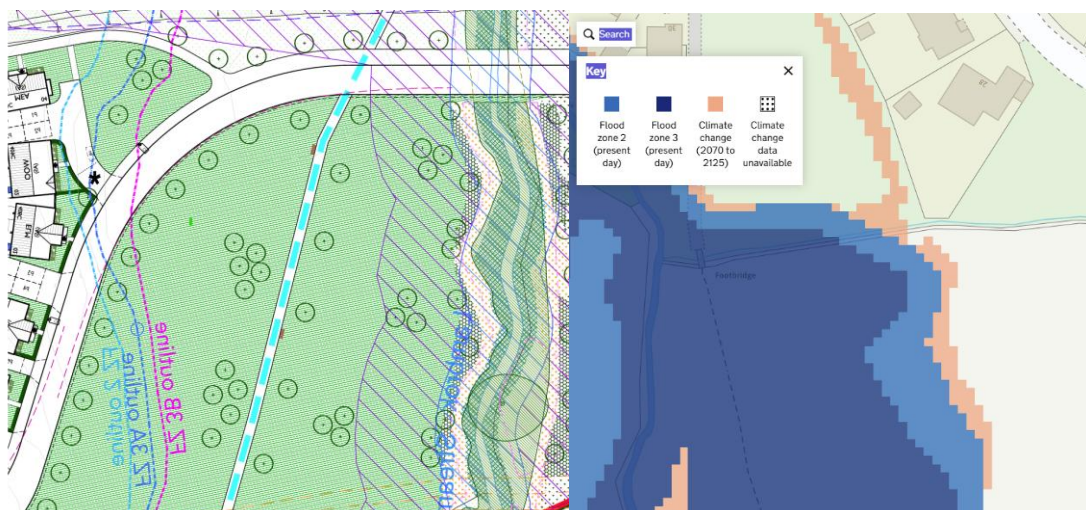
mitigation measures must be considered on a comprehensive and consistent basis.

Para 88

the need to be mindful of the cumulative impacts of development occurring elsewhere nearby.

These conditions are not met in the application in any form.

I have attached a "quick and dirty" pair of images showing the proposed bridge and access from the reserved matters application along with the same area taken from the current flood map for planning. Although there is no common scale, the location and position of the footpath is a diagnostic aid.



Taking the entire length of the main river, the current flood events, the non-compliance regarding conditions and the lack of any demonstrable sustainability, this application must be rejected in its current form.

Graham Hill

Trowbridge Chief Flood Warden