

NWAG Brief To Strategic Planning Committee

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Note to Strategic Planning Committee Members

When this application previously came before the Strategic Planning Committee in December, the Neston and Westwells Action Group (NWAG) submitted an objection paper in response to the Planning Officer's recommendation, which, as is standard practice, was issued five working days before the meeting.

At that time, NWAG highlighted a number of matters which we considered warranted Members' particular attention. These arose from long-standing local knowledge of the site combined with the opportunity to focus in depth on a single, technically complex proposal. Inevitably, assembling that response took time and resulted in a late submission. We apologise for this and wish to make clear that there was no intention to inconvenience or ambush Members.

This consolidated paper is therefore issued several weeks in advance of the anticipated February meeting to allow Members sufficient time to consider the issues raised.

The document draws together matters already submitted to the planning authority over the past 18 months, including concerns relating to drainage, noise, scale and massing, and the classification and history of the land. It explains how these matters relate to planning law, strategic policy, and adopted design guidance.

In preparing this paper, NWAG is conscious that the Council and its statutory consultees must, by necessity, rely on the accuracy and completeness of the technical material submitted by the applicant. Consultees are not normally resourced or mandated to re-model, re-survey, or independently verify that information, but instead respond to what is placed before them.

As a locally based, single-issue group, NWAG has been able to devote time and attention to examining the application in detail and, where concerns remained unresolved, to seek external professional advice. On that basis, NWAG members have personally funded specialist input on drainage and noise, as well as verified visual representations derived directly from the applicant's own plans, in circumstances where we considered that the submitted assessments did not fully reflect site-specific risks or local conditions.

We are transparent that the drainage specialist engaged by NWAG is also a local resident. However, their professional qualifications and experience in this field are substantial, and their advice has been provided openly and on its technical merits. The purpose of including this material is not to impugn motives, but to ensure that Members have access to alternative professional analysis where the evidence base before them is otherwise necessarily reliant on applicant-commissioned reports.

We recognise that this is a major and technically complex proposal, and that a degree of detail is unavoidable if Members are to be fully informed. An executive summary is therefore provided, and we have sought throughout to focus on matters that are material to the Committee's decision.

Executive Summary – Key Matters for Strategic Planning Committee Members

This submission is made by the Neston and Westwells Action Group (NWAG) to assist Members in their consideration of planning application PL/2024/05527 – Land south of Westwells Road (“the Donkey Field”).

It draws together matters raised throughout the application process and highlights where Members may reasonably wish to satisfy themselves that the proposal complies with the development plan and is supported by a complete, accurate and precautionary evidence base. Since the application last came before Committee, further professional analysis and documentary evidence has been obtained and is now incorporated.

1. Strategic Policy, Scale and the Settlement Edge

The proposal represents a substantial expansion of Spring Park beyond its established and historically contained boundary at Rowan Lane, into land that has long functioned as a transitional buffer between large-scale employment uses and low-scale residential development.

The 2021 appeal decision for housing on this site is a material consideration, but it was scheme-specific and conditional. Acceptability was explicitly linked to low-rise, landscape-led development that preserved the site’s buffering and settlement-edge role. The current proposal — a large-footprint, multi-storey industrial data-centre building — does not replicate those characteristics and represents a fundamentally different form of development.

2. Design Guidance Is Not Optional

The Wiltshire Design Guide (2024) and the Corsham Design Guide are adopted documents deriving statutory weight from Core Policy 57. Compliance is therefore a policy requirement, not a matter of subjective judgement.

The proposal conflicts with key design principles, including:

- Retaining a soft, green settlement edge;
- Respecting residential scale and massing at sensitive boundaries;
- Avoiding large, continuous industrial forms in transitional locations.

Where development cannot be made to comply with adopted design guidance, that non-compliance requires clear and compelling justification. None is provided.

3. Previously Developed Land (PDL) – Limited Planning Weight

While the site may now meet the technical definition of PDL, this condition arose through:

- Historic failure to restore the land to greenfield following wartime requisition; and
- More recent clearance works that reversed decades of naturalisation.

The Planning Inspector explicitly recognised that this PDL status was of recent manufacture and did not treat it as creating a presumption in favour of development. Acceptability at appeal was instead derived from the site’s continuing green, recreational and buffering role. PDL status is therefore a material consideration of limited weight, not a gateway principle.

4. Noise, Air Quality and Cumulative Environmental Effects

The application extends an operational data-centre campus and introduces 22 additional standby generators close to existing housing, including the Wadswick Green retirement community.

Members may reasonably wish to satisfy themselves that:

- Generator noise, including routine testing and cumulative operation across the wider campus, has been adequately assessed;
- Tonal and low-frequency noise under very low night-time background conditions has been properly addressed;
- Air-quality impacts have been assessed cumulatively, not in isolation; and
- Proposed mitigation and operational controls are robust, enforceable and precautionary.

Independent professional review commissioned by NWAG identifies material gaps in the applicant's noise evidence, particularly in relation to night-time conditions and cumulative effects.

5. Flood Risk and Drainage – Site-Specific and Strategic Concerns

Flood risk is not a peripheral or technical matter in this application. The site has a long and complex drainage history and lies within a wider catchment where surface-water risk remains unresolved.

Members are being asked to determine the application in circumstances where:

- Critical subsurface conditions remain unsurveyed;
- Key drainage assumptions are acknowledged by the applicant's own consultants to be preliminary;
 - Comparable nearby sites have experienced drainage failure; and
 - The wider flood-risk context is not fully understood or resolved.

In these circumstances, national and local policy requires a precautionary approach.

6. Economic Impact – Limited Weight in the Planning Balance

The applicant's Economic Impact Assessment relies on high-level modelling and headline figures that are not specific to Corsham or Westwells.

Independent review demonstrates that:

- Permanent employment generation is limited;
- Business-rate benefits do not equate to local fiscal gain;
- Construction-phase benefits are temporary and unsecured; and
- Opportunity cost is not addressed.

While data centres may deliver national infrastructure benefits, the evidence does not demonstrate significant, direct or additional economic benefit to the local area. Members are therefore entitled to attach limited weight to the economic case.

7. Overall Planning Balance

The issue before Members is not whether data centres are acceptable in principle, but whether this proposal, in this location, complies with the spatial strategy, adopted design guidance, and the precautionary approach required where residential amenity and environmental risk are engaged.

Taken together, the strategic policy, design, landscape, noise, flood-risk and economic considerations are aligned and cumulative. They cannot be resolved through conditions alone.

For these reasons, NWAG submits that planning permission should be refused.

Planning Strategic Policies and Design

Background and Planning History

The application site has a recent and relevant planning history which is relied upon extensively by the applicant in support of the current proposal. Reference is repeatedly made to a Planning Inspector's appeal decision in April 2021 which granted permission for residential development on the site.

That appeal decision is a material consideration and is therefore referred to in this submission. However, it is important to note that the Inspector's conclusions were scheme-specific and conditional, reached in the context of a low-rise, landscape-led housing proposal, and based on factual assumptions about the site that are now known to be incomplete or incorrect.

This document refers to the Inspector's report not as a precedent in favour of redevelopment in principle, but to demonstrate that the policy balance and landscape role identified as critical to acceptability at appeal have not been replicated in the current proposal.

Status of the Site and Policy Context

The Planning Statement places substantial reliance on the site being described as previously developed land and former MoD land. While the Planning Inspector accepted those descriptions when allowing a housing appeal, that acceptance was based on incomplete and incorrect briefing.

As set out in Appendices, 1, 2 and 3, Land Registry and historic archive evidence confirms the Donkey Field:

- Has never been owned by the Ministry of Defence or the War Department
- Was requisitioned in 1942 by the Ministry of Works as a civilian workers' accommodation camp
- Was later used as a hostel for displaced persons and refugees
- Was returned to its original owners, the Bath and Portland Stone Company, in 1956, some 70 years ago.
- Has no security fencing associated with secure MoD estates

Rowan Lane forms the historic and functional, securely fenced boundary of the MoD estate and separates the application site from Ark's Spring Park.

This calls into question the weight that can properly be attached to Core Policy 37 (Military Establishments). Even if Members conclude that CP37 is relevant, it does not override the wider spatial strategy or adopted design policies.

Relationship Between Strategic Policy and Design Guidance

Wiltshire Council's Wiltshire Design Guide (2024) and the Corsham Design Guide are adopted documents which derive their authority directly from the Wiltshire Core Strategy, in particular Core Policy 57.

Failure to comply with the Design Guides is therefore not a minor or aesthetic issue; it indicates a failure to comply with the development plan unless clear and compelling justification is provided.

Landscape Role, Scale and Settlement Edge

The Planning Inspector allowed housing on the site only because the proposal:

- Was low-rise and landscape-led
- Preserved the site's transitional and buffering role from Industrial and MoD land on Westwells Road
- Maintained a soft settlement edge between Spring Park and surrounding residential areas

The current proposal replaces that transitional role with an 18-metre-high, large-footprint industrial building, bringing large-scale built form directly up to the edge of low-scale residential development (44m). This represents a fundamental change in character and is not supported by the Inspector's reasoning.

Wiltshire Design Guide – Sense of Place, Health and Resource Use

The Wiltshire Design Guide requires development to:

- Create a strong sense of place
- Be complementary to the locality
- Promote health, wellbeing and community

The Donkey Field is a valued open space, crossed by five long-established public footpaths and regularly used by local residents for recreation. The introduction of a large industrial data centre in this location would:

- Remove an important informal community space
- Introduce industrial noise and activity close to housing and a nearby retirement village
- Undermine the sense of place and wellbeing the Design Guide seeks to protect

In addition, the proposal raises unresolved concerns in relation to resource intensity, particularly:

- The very high electrical demand associated with data centre operation
- The significant water usage required for cooling and resilience

While these matters are addressed in technical submissions, their scale and intensity sit uneasily with the Design Guide's emphasis on sustainable, community-focused development and further underline the incompatibility of this form of development with its immediate residential context.

Local Character and Building Scale (Corsham Design Guide)

The Corsham Design Guide identifies the site within Character Area 20 – Westwells and Wadswick Green, where guidance includes:

- Retaining the Rural Green Buffer
- Favouring two storey development and avoiding large-footprint buildings
- Respecting existing residential scale, massing and vernacular materials
- Preserving the area's open and green character

An 18 metre high (equivalent to a five storey residential building height) industrial building with a large continuous footprint is fundamentally inconsistent with these requirements. The fact that such a building cannot be made to comply does not render non-compliance acceptable.

Previously Developed Land Status and Planning Weight

The application places significant emphasis on the site now meeting the technical definition of Previously Developed Land (PDL). While this may be correct in a narrow, physical sense, it is important to understand how that condition arose and what weight it should properly carry in planning terms.

Following the closure of the wartime accommodation camp, the land was intended to be returned to a greenfield condition. However, despite compensation having been paid, the site was not properly restored in 1956, and remnants of former structures remained below ground. Over subsequent decades, the land naturally regenerated, becoming grassed, scrubbed, and functioning visually and socially as open countryside.

More recently, clearance works undertaken by prospective developers stripped away that naturalisation and re-exposed historic foundations and groundworks. These works effectively reversed the effects of time, creating the current physical appearance of brownfield land. The present condition is therefore not the result of ongoing or recent development activity, but of historic failure to restore the land and later deliberate clearance.

When considering the earlier housing appeal, the Planning Inspector accepted that, at the time of decision, the site met the technical definition of Previously Developed Land. However, the Inspector also expressly recognised that this condition was of recent manufacture and did not reflect the site's long-standing function or character. Crucially, the Inspector identified the land as performing a pseudo-green space role, valued for informal leisure use and for its importance as a transitional buffer between large-scale employment development and lower-scale residential areas.

The Inspector's conclusions make clear that acceptability was not derived from brownfield status alone, but was conditional on the site retaining that transitional and landscape role through low-rise, landscape-led development. The Inspector did not treat PDL status as creating a presumption in favour of development.

Accordingly, while the site may now display some physical characteristics of brownfield land, that fact does not, in itself, justify redevelopment. National policy is clear that being Previously Developed Land is a material consideration, not a policy allocation or automatic gateway. In this case, the circumstances by which the site came to appear brownfield, and the Inspector's explicit recognition of its green, recreational and buffering functions, significantly limit the weight that can properly be attached to its PDL status.

The planning balance must therefore turn not on the technical classification of the land, but on its current role, context, and contribution to settlement character, all of which the Inspector identified as critical to acceptability.

Relationship with the Existing Spring Park and Community Response

Local Residents have in recent years accepted the development of data centres within the defined Spring Park site, recognising it as a contained business park north of Rowan Lane.

The outline planning permission in 2005 was for a mix of industrial and office buildings in an area that was already industrial in nature and was separated from residential areas. It was

therefore supported by residents and Corsham Town Council for its potential and economic benefits.

By contrast, the proposal to extend development south of Rowan Lane and beyond the wooded spoil heap has generated exceptional public concern, reflected in approximately 1,200 individual objections to this application. This level of objection is not directed at the existence of Spring Park itself, but at the perceived breach of the long-established physical and landscape containment provided by Rowan Lane.

This public response is consistent with the professional advice previously given by Wiltshire Council's Landscape Officer in the Delegated Report for the adjoining Hawthorne (ex Stephen's Plastics) site, planning reference PL/2023/10233.

“...a clear landscape planning steer that further applications for further large industrialising data centre/shed insertions south of Rowan Lane, beyond and breaching the TPO woodland strip (running along the southern edge of Rowan Lane, will result in landscape reasons to recommend objection, based on the resulting harm to the local character of the area ... “

The strength and focus of public objection therefore reinforces, rather than replaces, the policy and landscape concerns identified elsewhere in this document.

Conclusion

The proposal fails to comply with:

- The spatial strategy of the Wiltshire Core Strategy
- The landscape and settlement-edge principles relied upon by the Planning Inspector
- The Wiltshire Design Guide (2024)
- The Corsham Design Guide.

Taken together, the proposal represents an unjustified extension of a high rise industrial area into a valued open and residentially sensitive area. The strategic policy and design objections are aligned, cumulative, and cannot be resolved through mitigation.

Planning permission should therefore be refused.

Noise, Air Quality and Cumulative Environmental Effects

This application extends an operational data centre complex and introduces 22 additional standby generators close to existing residential areas, including the Wadswick Green retirement community. The key issue for Members is whether the environmental evidence before the Council is sufficiently complete and precautionary to support a robust decision.

There are material gaps in how noise and air quality impacts have been assessed.

Noise – What Has and Has Not Been Assessed

Residents have made clear, specific representations about noise affecting quality of life, particularly night-time disturbance and the presence of tonal noise¹.

The submitted Noise Impact Assessment primarily addresses noise from continuously operating plant and equipment. In particular, Members may wish to note that the assessment:

- Focuses on normal, steady-state operational plant noise;
- Does not appear to explicitly assess noise arising from standby generator operation, including routine testing regimes or emergency use; and
- Does not assess the cumulative effect of generator noise when considered alongside existing generator infrastructure across the whole of Spring Park.

While generator operation may be intermittent, routine testing forms a necessary part of normal data-centre operation. The submitted material does not clearly explain how noise from such testing has been factored into the assessment, nor how this would be managed during night-time or other periods of low background noise.

As a result, Members may wish to consider whether the evidence provided sufficiently demonstrates that generator-related noise would not give rise to disturbance at nearby noise-sensitive receptors, particularly under low-background or night-time conditions.

Air Quality – Cumulative Impacts Not Fully Considered

- The application introduces 22 additional generators alongside a substantial existing generator fleet already operating at Spring Park.
- Residents have reported episodes of poor air quality coinciding with generator activity.
- The submitted Air Quality Assessment does not aggregate existing and proposed generators as a single emission source, despite:
 - Common ownership and operation;
 - Physical proximity; and
 - The modelling presented does not represent a true worst-case scenario and may understate short-term pollution exposure risks, particularly during testing or outage events.

¹ [Example Video sound recording, analysed in the specialist report.](#)

Sensitive Receptors – Wadswick Green

Wadswick Green is a retirement community comprising approximately 240 dwellings and a resident population of over 300 people, aged 60 and above. In planning terms, this population constitutes a sensitive receptor, particularly in relation to noise disturbance and air-quality impacts.

The proposed generator compound is approximately 85 metres from Wadswick Green, significantly closer than the nearest dwellings on Westwells Road. National policy and adopted local guidance require particular care where development has the potential to affect health, wellbeing and residential amenity, especially for more vulnerable populations.

In this context, Members may wish to note that the application provides no clear evidence that:

- Wadswick Green was explicitly identified and assessed as a sensitive receptor in the layout, design or assessment process;
- The proximity and vulnerability of this community informed decisions about generator siting; or
- Enhanced mitigation was considered to reflect the characteristics of the affected population.

Residents of Wadswick Green also rely on Rowan Lane for access and daily walking, a narrow route with no dedicated pedestrian infrastructure, which is proposed to accommodate construction and operational activity associated with both the existing Spring Park and the proposed development.

Taken together, these factors indicate that the potential impacts on the most sensitive nearby population have not been clearly or transparently assessed, raising material concerns about compliance with policies that seek to protect residential amenity, health and wellbeing.

What Members May Wish to Satisfy Themselves On

Before determining the application, Members may reasonably ask officers to confirm whether:

- Generator noise (including testing and cumulative operation) has been adequately assessed;
- Air-quality modelling properly aggregates existing and proposed generators across Spring Park;
- Impacts on the Wadswick Green retirement community have been explicitly considered as a sensitive receptor;
- Mitigation, monitoring, and operational controls are sufficiently robust and enforceable; and
- The environmental evidence base is complete enough to withstand scrutiny and potential challenge.

Conclusion

The issue is not whether data centres are acceptable in principle, but whether this specific proposal, in this specific location, has been supported by sufficient environmental evidence.

On noise and air quality, particularly in relation to generators and vulnerable residents, that evidence is currently incomplete.

Noise and Residential Amenity

Evidence Base

Noise is a material planning consideration due to the proximity of existing housing, including a retirement village², and the presence of operational data centres in the area.

The applicant relies on a Noise Impact Assessment (Sweco, May 2024) and a subsequent Technical Note responding to representations (October 2024). These have been reviewed independently by the Industrial Noise & Vibration Centre (INVC), whose findings are submitted as [Appendix 4](#). Public Protection consultation responses and the Institute of Acoustics briefing note on Low Frequency Noise (LFN) provide additional context.

Existing Noise Environment

The applicant's own surveys confirm very low night-time background noise levels (approximately 26–28 dB(A)) at nearby residential receptors. Public Protection also confirm that complaints of low-frequency noise have been received from households in the area, suspected to originate from existing data centre operations. As recognised in the IoA briefing note, low-frequency noise is not audible to all listeners, is most noticeable indoors and at night, and disproportionately affects older residents. The baseline environment must therefore be regarded as noise-sensitive.

Assessment Approach and Expert Review

The applicant's assessment relies primarily on BS4142 margin-based comparison using A-weighted data and concludes that no tonal penalty is required. The independent INVC review concludes that this approach is not robust in this context and identifies that:

- A-weighted measurements alone are inadequate where low-frequency and tonal noise are known concerns
- Objective analysis demonstrates that existing data centre noise is tonal, including low-frequency components
- The assertion that there is “no evidence that the noise would be tonal” is incorrect
- In the absence of objective tonal data for the proposed plant, worst-case tonal penalties should be assumed
- The mitigation strategy focuses on overall noise reduction and does not adequately address tonal or low-frequency noise at source, nor demonstrate that Best Practicable Means have been applied

Public Protection position

Public Protection acknowledges the presence of low-frequency noise complaints and accept that data centres include plant commonly associated with tonal noise. While they ultimately raise no objection on statutory nuisance grounds, they also recognise uncertainty around tonal penalties and the limitations of assessment where background levels are very low. A more precautionary approach was taken by Public Protection in relation to the nearby Brockleaze BESS proposal³, illustrating the limits of relying solely on BS4142 margins where noise character and perception are critical.

² While planning policy does not define retirement villages as a separate statutory category of sensitive receptor, national guidance and established practice clearly recognise residential uses — particularly those with higher daytime occupancy and more vulnerable populations — as noise- and air-quality-sensitive receptors. Retirement communities such as Wadswick Green therefore warrant a precautionary and enhanced approach when assessing noise, air quality and cumulative environmental impacts.

³ [Application PL/2025/05552](#)

Planning conclusion on noise

Noise impact in planning terms extends beyond the statutory nuisance test. Policy requires protection of residential amenity and health, taking account of context, character and cumulative effects. Given the low background noise levels, the proximity of sensitive receptors, existing complaints of low-frequency noise, and the credible independent evidence identifying deficiencies in the applicant's assessment and mitigation, it has not been robustly demonstrated that unacceptable noise impacts would be avoided. Noise therefore remains a material consideration weighing against the proposal.

Flood Risk – Summary

Purpose of this Section

This section summarises the key flood-risk issues relevant to the Committee’s consideration of planning application PL/2024/05527 (Land South of Westwells Road, “the Donkey Field”).

It draws together evidence from long-standing local flood history, recent development impacts, and the applicant’s own submissions, and explains why flood risk remains a fundamental and unresolved planning constraint.

Detailed technical evidence is provided separately in:

- Appendix 1 (Wider Area Flood Risk) and
- Appendix 2 (Site-Specific Flood Risk – Donkey Field), including the commissioned independent flood expert report.

1. Flood Risk in the Wider Westwells Area – An Unresolved Strategic Issue

The Westwells/Neston area occupies the lowest point in a natural topographical “bowl” and functions as a surface-water sump. Historically, runoff was accommodated by quarries and underground workings, particularly the former Sands Quarry beneath the Donkey Field, which was abandoned in 1912 due to chronic flooding.

There is no functioning, coherent surface-water drainage system serving the area today:

- The historic Ministry of Defence surface-water drain is collapsed and unusable.
- The foul sewer remains in use but is already operating at or beyond capacity.
- The routing, ownership, and discharge points of several drainage assets (including reservoir overflow and highway drainage) are unknown or incorrectly mapped, even by statutory bodies.

A serious flood event occurred in 2014. Its causes have never been fully investigated, but are widely understood to be linked to upslope development, increased impermeable surfaces, and altered drainage paths.

The Lead Local Flood Authority has explicitly advised that flood risk in this location must be assessed using a catchment-based approach, reflecting vulnerability to down-flooding from adjacent and upslope sites. That strategic assessment has not been undertaken.

Recent development activity at nearby sites (including Wadswick Green and ARK’s Hawthorn data centre) has demonstrated that earlier assumptions about surface-water containment and routing were incorrect in practice, resulting in exceedance flows being diverted downslope into Westwells.

NPPF References:

174 Planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution or flooding.

176 Development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change.

180 When determining planning applications, local planning authorities should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of climate change over its lifetime.

Key Point for Members:

The flood risk situation across the wider Westwells catchment is poorly understood, inconsistently recorded, and actively changing as a result of development. In these circumstances, national policy requires a precautionary approach.

2. Implications for the Donkey Field in Strategic Flood-Risk Terms

As the lowest point within this drainage bowl, the Donkey Field performs (and has historically performed) an important role in accommodating surface water during heavy rainfall events.

Where flood risk in the wider area is uncertain or unresolved, the National Planning Policy Framework is clear that:

- Land which may be required for flood storage or flood risk management should not be developed; and
- Development should not proceed on the basis of incomplete or speculative understanding of flood behaviour.

Until the wider flood-risk picture is properly understood and resolved, the Donkey Field cannot

3. Site-Specific Flood Risk – The Current Application

Independently of the wider area issues, the Donkey Field application fails to demonstrate that it would not increase flood risk elsewhere, as required by national and local policy.

Key points include:

- The site is underlain by abandoned underground mine workings, which historically flooded and have not been surveyed.
- The applicant's own consultants explicitly state that, in the absence of a full mine survey, all drainage and flood-risk conclusions are preliminary and speculative.
- Despite this, no full mine stability or condition assessment has been undertaken.
- The proposed drainage strategy relies primarily on infiltration, notwithstanding:
 - Extensive historic evidence that infiltration has failed on this site and immediately adjacent land; and
 - Proven infiltration failure at ARK's neighbouring Hawthorn data centre site.
- The Ministry of Defence, as owner of the underground workings, was consulted very late and has made clear that further information or design changes would require re-consultation.

In planning terms, this means the application has not discharged the burden of proof required to show that:

- Surface water can be safely managed on site; or
- Flood risk will not be increased elsewhere, including to existing residential communities downslope.

4. Planning Consequences

The evidence before the Council points to two independent but reinforcing conclusions:

1. Strategic (Wider Area) Conclusion

Flood risk across the Westwells catchment is insufficiently understood. In these circumstances, development should not proceed until a coherent, catchment-wide understanding of flood behaviour and drainage capacity is established. As the lowest point in the system, the Donkey Field may be required for flood protection and should not be developed prematurely.

2. Application-Specific Conclusion

The Donkey Field proposal cannot be approved because it has not demonstrated, on the basis of robust and complete evidence, that it would not increase flood risk elsewhere. The drainage strategy relies on untested assumptions that are acknowledged by the applicant's own consultants to be speculative.

5. Closing Summary

Flood risk is not a secondary or technical detail in this application; it is a central planning issue.

The Committee is being asked to determine a proposal in circumstances where:

- The wider flood-risk context is unresolved;
- Key drainage infrastructure is unknown or mis-recorded;
- The site itself has a long history of flooding and failed drainage; and
- The applicant's own evidence accepts that critical assumptions remain unproven.

On that basis, approval would be contrary to the precautionary and evidence-led approach required by national and local planning policy.

Economic Impact Assessment

Context

The applicant has submitted an Economic Impact Assessment (EIA) prepared by consultants in support of the proposed data centre development at Land South of Westwells Road. A review prepared on behalf of local residents by a qualified accountant, challenges those claims.

This summary highlights the key points relevant to the planning balance.

Headline Economic Claims

The applicant's EIA relies on the following headline figures:

- £98 million Gross Value Added (GVA) per annum
- 50 direct operational jobs
- 87 net additional FTE jobs (including multipliers)
- £4 million per annum in business rates
- £13.4 million social value (construction phase)

These figures are presented at a high level and are largely derived from national or regional modelling.

Key Issues with the Economic Case

- Lack of Local Specificity. The economic modelling is not site-specific to Corsham or Westwells. Much of the claimed benefit reflects national or sector-wide impacts rather than demonstrable local outcomes.
- Employment is Limited. Data centres are capital-intensive and employ relatively few people once operational. The number of permanent, locally accessible jobs is modest and small in relation to the scale and duration of the development.
- Business Rates Do Not Represent Local Gain. Business rates are pooled and redistributed nationally. No evidence has been provided to demonstrate a meaningful net fiscal benefit to Corsham or Wiltshire.
- Construction Benefits Are Temporary. Construction-phase jobs and social value claims are time-limited, modelled estimates and are not secured through binding mechanisms.
- Social Value Claims Are Aspirational. Apprenticeships, work placements and community benefits are not guaranteed and are not tied to enforceable delivery or monitoring.
- Opportunity Cost Not Addressed. The EIA does not consider alternative, more employment-dense or community-serving uses of the land. A data centre effectively sterilises the site for decades while generating minimal local economic interaction.

Overall Planning Weight

While data centres may deliver national economic and infrastructure benefits, the evidence does not demonstrate that this particular proposal delivers significant, direct, or additional economic benefit to Westwells or Corsham.

In planning terms, the Economic Impact Assessment:

- overstates local benefits,
- relies heavily on generic modelling,
- underplays uncertainty and displacement, and
- does not address opportunity cost.

Members are therefore entitled to attach limited weight to the applicant's economic case when balancing it against the identified landscape, environmental, drainage, policy and community impacts of the proposal.

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Appendix 1. Research into Land Ownership

Originally owned by Bath and Portland Stone Company to mine Sands and Spring Quarry.

Land requisitioned by the Ministry of Works in 1939 to build temporary huts to house 1,000 Irish and UK construction workers needed to create underground storage for weapons and ammunition and a factory to build aircraft engines. These hostel sites were run by an agent of Ministry of Works, National Service Hostels Corporation Ltd.

Westwells Hostel accommodated misplaced persons after the war and was closed in 1957. Ministry of Works returned the land to Bath and Portland Stone in the 1950s. The land has been privately owned for over 70 years.

Evolution of the UK Ministry of Works & Ministry of Defence

Wartime Expansion (1940-1943): Became the Ministry of Works and Buildings (1940), handling urgent wartime construction and housing.

Post-War Focus (1943-1962): Became the Ministry of Works, focusing on postwar reconstruction, new building methods, and managing government property. Absorbed into the Department of the Environment in 1970.

This site, known locally as “the Donkey Field” was not passed onto the Ministry of Defence (or its predecessor, Dept of War). It has never been “behind the wire of the MoD estate and has been in private ownership since 1956.

We have further evidence to show all accommodation was temporary including an archive folder detailing the set up of the temporary school in Westwells for hostel child placements. Wiltshire Council dismissed the refurbishment of the school due to the expected hostel site closure.

CONCLUSION

- The land was requisitioned temporarily for wartime purposes.
- All structures were temporary and expressly intended to be demolished to ground level.
- An undertaking to demolish the buildings to ground level was formally given.
- The land was returned to private ownership over 70 years ago.

Considering the above, the land should not be referenced as ex MOD land for the purposes of national and local planning policy

Appendix 2. Previously Developed Land Status and Planning Weight

The application places significant emphasis on the site now meeting the technical definition of Previously Developed Land (PDL). While this may be correct in a narrow, physical sense, it is important to understand how that condition arose and what weight it should properly carry in planning terms.

Following the closure of the wartime accommodation camp, the land was intended to be returned to a greenfield condition. However, despite compensation having been paid, the site was not properly restored to agricultural land as required by the authorities after 1956. The temporary wooden huts were removed but the more permanent hard standing bases, roads, paths, and drains remained below ground. Over subsequent decades, the land naturally regenerated, becoming grassed, scrubbed, and functioning visually and socially as open countryside.

More recently, clearance works undertaken by prospective developers stripped away that naturalisation and re-exposed historic foundations and groundworks. These works effectively reversed the effects of time, creating the current physical appearance of brownfield land. The present condition is therefore not the result of ongoing or recent development activity, but of historic failure to restore the land and later deliberate clearance.

When considering the earlier housing appeal, the Planning Inspector accepted that, at the time of decision, the site met the technical definition of Previously Developed Land. However, the Inspector also expressly recognised that this condition was of recent manufacture and did not reflect the site's long-standing function or character. Crucially, the Inspector identified the land as performing a pseudo-green space role, valued for informal leisure use and for its importance as a transitional buffer between large-scale employment development and lower-scale residential areas.

The Inspector's conclusions make clear that acceptability was not derived from brownfield status alone, but was conditional on the site retaining that transitional and landscape role through low-rise, landscape-led development. The Inspector did not treat PDL status as creating a presumption in favour of development.

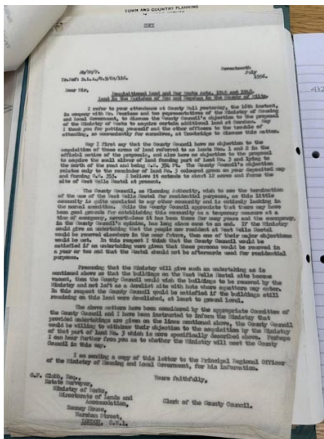
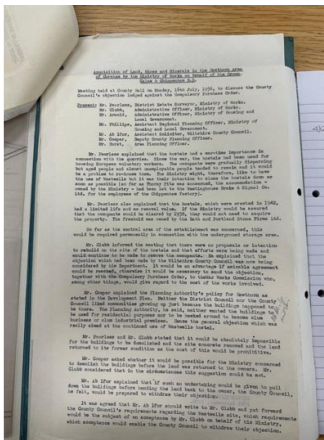
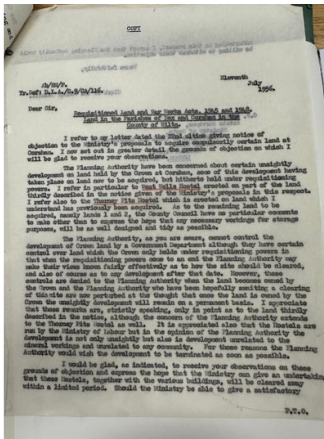
Accordingly, while the site may now display some physical characteristics of brownfield land, that fact does not, in itself, justify redevelopment. National policy is clear that being Previously Developed Land is a material consideration, not a policy allocation or automatic gateway. In this case, the circumstances by which the site came to appear brownfield, and the Inspector's explicit recognition of its green, recreational and buffering functions, significantly limit the weight that can properly be attached to its PDL status.

The planning balance must therefore turn not on the technical classification of the land, but on its current role, context, and contribution to settlement character, all of which the Inspector identified as critical to acceptability.

If members require more detail about the history and the dialogue about returning the land to a Greenfield state and the consistent refusal by the councils to allow development on the site letters copied from the Swindon and Wiltshire Archive Centre in APPENDIX XX shows some of the large volume of documents on this subject.

Appendix 3. Historical Evidence about Return to Greenfield Status and Development Refusal.

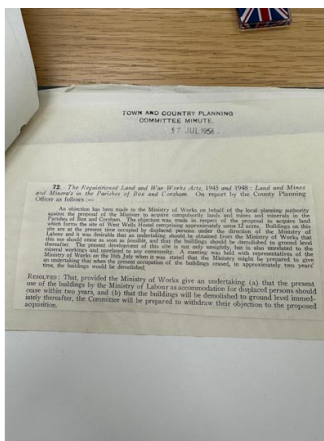
Letters copied from the large correspondence file relating to this matter:



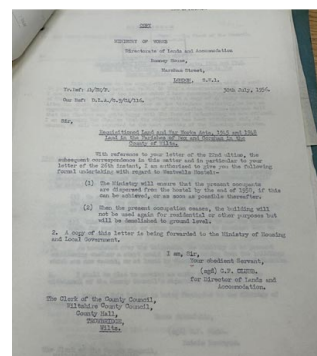
In a letter dated 11 July 1956, Wiltshire County Council formally set out its planning objection to the Ministry of Works' proposal to compulsorily acquire land at Corsham, focusing in particular on West Wells Hostel (now known as the Donkey Field). The Council argued that the hostel and associated buildings were unsightly, isolated, and unrelated to either mineral workings or any settled community, and expressed concern that Crown ownership would allow this temporary wartime development to become permanent. The Council indicated that it would be prepared to withdraw its objection if the Ministry undertook to terminate hostel use and clear the buildings within a limited period, a position that directly led to the subsequent committee resolution and the Ministry's formal undertaking later in July 1956.

At a meeting on 16 July 1956, Wiltshire County Council and representatives of the Ministry of Works discussed the proposed compulsory purchase of land at Corsham, including the Westwells Hostel site (now known as the Donkey Field). The Ministry explained that the hostels, built in 1942 for wartime use, were intended to be closed as soon as residents could be rehoused, and that there were no plans to rebuild on the site. The County Council objected to the continued residential or commercial use of the isolated hostel site and indicated it would withdraw its objection if the Ministry undertook to remove occupants and demolish the buildings before returning the land to its owners. The meeting concluded with agreement that these conditions would be set out in writing, forming the basis for resolving the Council's objection.

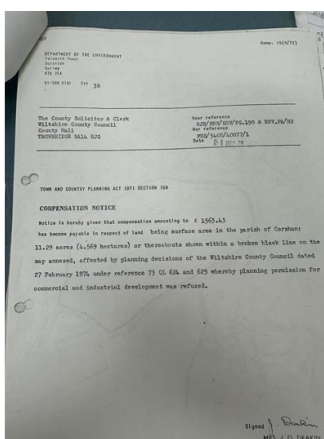
In July 1956, Wiltshire County Council objected to the Ministry of Works' acquisition of land at Corsham that included Westwells Hostel (the site now known as the Donkey Field). The Council argued that the hostel's isolated residential use was no longer justified after the wartime emergency and stated it would withdraw its objection only if residents were rehoused, the site ceased to be used for housing, and the buildings were demolished to prevent dereliction.



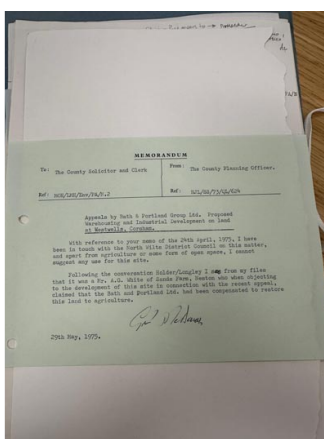
On **17 July 1956**, the County Town and Country Planning Committee recorded its objection to the compulsory acquisition of land including **West Wells Hostel** (about **12 acres**, now known as the **Donkey Field**). The Committee agreed to withdraw its objection **only if** the Ministry of Works undertook that residential use would cease within **two years** and that the buildings would then be **demolished to ground level**, citing the site's isolation, unsightly condition, and lack of connection to any community or mineral workings.



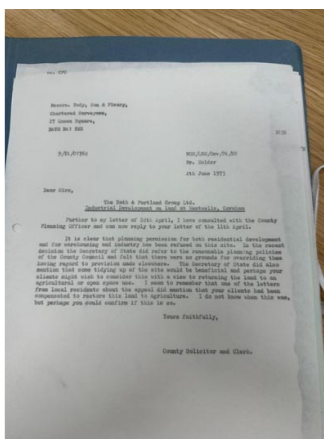
The Ministry of Works' formal response to, and satisfaction of, Wiltshire County Council's planning objection relating to Westwells Hostel (now the Donkey Field).



This document is a **Compensation Notice issued by the Department of the Environment in December 1978 under Section 158 of the Town and Country Planning Act 1971**. It records that compensation of **£1,563.43** became payable in respect of **11.29 acres of land in the parish of Corsham**, following Wiltshire County Council's **refusal of planning permission for commercial and industrial development on 27 February 1974**. The notice confirms that the planning refusal had a compensable impact on the land's development value, formally recognising financial loss arising from planning control.



This **memorandum dated 29 May 1975** records the County Planning Officer's view following consultation with North Wiltshire District Council that **no acceptable use exists for the Westwells site other than agriculture or open space**. It also notes an objection during the recent appeal by a local resident, **Mr A. G. White of Sands Farm, Neston**, who asserted that **Bath & Portland Group Ltd. had previously been compensated to restore the land to agricultural use**. The memo supports the Council's consistent position that redevelopment of the site for warehousing or industrial purposes was inappropriate and that restoration was the preferred outcome.



In a letter dated **4 June 1975**, Wiltshire County Council confirmed to the landowner's surveyors that **planning permission for residential, warehousing, and industrial development at Westwells, Corsham had been refused**, and that the **Secretary of State upheld the County Council's planning policies** on appeal. The Secretary of State suggested that the site would benefit from **tidying up and restoration**, potentially returning it to **agricultural or open space use**. The letter also notes an understanding—raised by local residents—that the landowner **may already have received compensation to restore the site to agriculture**, and requests confirmation of whether such compensation had been paid.

Appendix 4. Specialist Report - Noise

REPORT COMMISSIONED BY NWAG IN RESPONSE TO WILTSHIRE COUNCIL'S PUBLIC PROTECTION CONSULTEE REPORT FOUND IN PLANNING APPLICATION PL/2024/05527 – LAND SOUTH OF WESTWELLS

See separate document:

Industrial Noise & Vibration Centre, Report Number R10864 dated 7 Jan 26, author Peter Wilson

Appendix 5 - Flood Risk in the Wider Westwells Catchment, Context and Evidence

Scope of this Appendix

This appendix provides contextual and factual evidence relating to surface-water flood risk across the wider Westwells / Neston area.

It does not assess the merits of planning application PL/2024/05527 in isolation.

Its purpose is to demonstrate why flood risk in the locality remains strategically unresolved, requiring a precautionary approach to further development.

A5.1 Purpose and Relationship to the Main Report

This appendix provides contextual and evidential material relating to surface-water flood risk across the wider Westwells / Neston catchment, within which the Donkey Field is located.

It supports the Flood Risk – Summary for Members by setting out the historic, physical and infrastructural conditions that inform flood behaviour in the area, including topography, drainage pathways, legacy infrastructure and recent observed outcomes from development activity. The material presented here is factual and descriptive in nature.

This appendix does not assess the detailed drainage design of planning application PL/2024/05527, nor does it seek to substitute for a site-specific Flood Risk Assessment. Those matters are addressed separately in Appendix 2, together with the commissioned flood expert report.

The purpose of this appendix is to demonstrate that flood risk in the wider Westwells area remains strategically unresolved, and that key assumptions relied upon in individual site assessments cannot be safely understood in isolation from the wider catchment. This is directly relevant to the application of the precautionary approach required by national policy, particularly where development may contribute to, or be affected by, cumulative flood risk.

Evidence in this appendix is relevant to the interpretation of the National Planning Policy Framework, including the requirement to avoid development that contributes to unacceptable flood risk, to consider cumulative impacts, and to ensure that land which may play a role in flood management is not compromised by premature development.

The findings of this appendix inform, but do not predetermine, the site-specific conclusions reached in [Appendix 6](#).

A5.2 Topography, Catchment and Natural Drainage Characteristics

The Westwells / Neston area occupies the lowest point within a small but clearly defined local catchment. Surrounding land rises on all sides, with surface water naturally draining downslope towards Westwells via a combination of overland flow, shallow sub-surface pathways and historic drainage routes.

Within this catchment, the land locally known as the Donkey Field sits at the lowest topographical point, forming a natural collection area for surface water during periods of heavy or prolonged rainfall. This configuration has existed for over 100 years and has shaped both historic land use and the development constraints that apply to the area.

In the absence of a coherent modern surface-water drainage network, rainfall runoff has historically been accommodated through a combination of natural attenuation, temporary ponding, and infiltration into underlying quarry voids and mine workings. These features have played a functional role in moderating flood behaviour across the wider area, albeit imperfectly.

The catchment is sensitive to change. Incremental development on higher ground has increased the extent of impermeable surfaces and altered historic runoff pathways, resulting in faster conveyance of surface water downslope. Where such changes are not accompanied by effective interception or attenuation, increased volumes of water are directed toward the lowest parts of the system.

These topographical and hydrological characteristics mean that flood risk at Westwells cannot be assessed solely by reference to individual sites in isolation. Changes in land use or drainage at any point within the catchment have the potential to produce cumulative and downstream effects, particularly at its lowest point.

This physical context underpins the need for a catchment-based understanding of flood risk and informs the application of national policy requiring a precautionary approach where the consequences of development are not fully understood.

A5.3 Historic Flooding and Long-Term Water Behaviour

From the late nineteenth century onwards, underground quarrying significantly altered local hydrology. Sands Quarry, which underlies the Donkey Field, was known locally as the “Waterhole” due to persistent flooding and was ultimately abandoned in 1912 for that reason. Since closure, the mine workings have continued to flood and remain abandoned.

Although the area was historically recognised as wet for extended periods, there are no formally recorded flood events prior to the modern era. This changed in 2014, when a significant flood affected properties at Westwells Road. The causes of that event have never been subject to a comprehensive investigation, and no definitive conclusions were drawn as to the relative contribution of rainfall intensity, upslope development, or altered drainage routes.

The absence of a clear historic baseline for flood behaviour limits confidence in current flood-risk assessments and reinforces the need to treat recent events and observed outcomes as material evidence.

A5.4 Existing Drainage Infrastructure – Known Deficiencies and Unknowns

The Westwells area is not served by a comprehensive or coherent surface-water drainage system. Historic infrastructure installed during Ministry of Defence use of the underground quarries included a surface-water discharge route to Spring Lane and onward to the Byebrook. That system is now understood to be collapsed or largely non-functional.

The foul sewer serving the area remains in use but is operating at or near maximum capacity. It does not provide a viable alternative route for surface-water discharge without risk of surcharge or failure.

Beyond these known constraints, several elements of drainage infrastructure are either poorly documented or demonstrably mis-recorded. These include:

- Reservoir overflow pipes whose routes and discharge points differ from official asset records;
- Highway drainage systems where neither routing nor final outfall locations are known with certainty; and
- Private legacy drains, believed to be under Ministry of Defence ownership, whose condition, capacity and lawful use remain unclear.

The cumulative effect of these deficiencies is that surface-water routing within the catchment is not fully understood by statutory bodies, developers, or decision-makers. In several cases, assumptions relied upon in planning decisions have subsequently been shown to be inaccurate

A5.5 Evidence from Recent and Ongoing Development Impacts

Recent development within and adjacent to the Westwells catchment provides direct evidence that prior flood-risk assumptions have not held true in practice.

At Wadswick Green (formerly the Royal Arthur site), development was approved on the basis that all surface water would be retained on site. During construction, exceedance flows occurred and were diverted downslope, contrary to the approved drainage strategy. Attempts were made to route water into historic drains without prior assessment or permission, resulting in downstream impacts that required intervention by the flood authority.

Similarly, at ARK's Hawthorn data centre site upslope, infiltration-led drainage assumptions have not performed as anticipated. Surface-water management at that site has relied on fragile legacy infrastructure and unresolved drainage conditions, with knock-on implications for the wider area.

These outcomes are significant because they demonstrate that:

- Surface-water behaviour within the catchment is highly sensitive to change;
- Site-specific drainage strategies have failed to account adequately for cumulative effects; and
- The practical performance of drainage systems has diverged from that predicted at planning stage.

Observed outcomes therefore provide important evidence that must inform strategic flood-risk understanding.

A5.6 Requirement for a Catchment-Based Assessment

The complexity and interdependence of flood behaviour across the Westwells area has been recognised by the Lead Local Flood Authority, which has advised that flood risk in this location must be considered using a catchment-based approach.

This reflects the reality that surface-water flows do not respect site boundaries, and that development on higher ground can materially affect flood risk at lower points within the system. In such circumstances, reliance on isolated site-level assessments risks underestimating cumulative and downstream impacts.

These observed outcomes demonstrate that prior assumptions regarding surface-water behaviour within the catchment have not proven reliable in practice. The strategic implications of this evidence are addressed in Section A1.7.

Until these matters are resolved, flood-risk assessment within the catchment remains necessarily uncertain.

A5.7 Implications for Strategic Planning Decisions

The evidence set out in this appendix demonstrates that flood risk across the Westwells catchment is strategically unresolved. The area lacks a reliable drainage framework, contains significant unknowns in relation to infrastructure and subsurface conditions, and has experienced recent flooding and exceedance events that were not predicted by approved drainage strategies.

In this context, land at the lowest point of the catchment cannot be assumed to be surplus to flood-management needs. Development decisions taken in advance of a coherent understanding of catchment behaviour risk foreclosing options for flood mitigation and increasing vulnerability to downstream flooding.

National planning policy requires that decisions avoid development that contributes to unacceptable flood risk, take account of cumulative impacts, and apply a precautionary approach where evidence is incomplete. The matters documented in this appendix are therefore directly relevant to the strategic assessment of proposals within the Westwells area, including but not limited to the Donkey Field site.

Appendix 6 Flood Risk and Drainage Assessment – Donkey Field (PL/2024/05527)

A6.1 Purpose and Relationship to the Main Report

This appendix provides a site-specific assessment of flood risk and surface-water drainage in relation to planning application PL/2024/05527 (Land South of Westwells Road, locally known as the Donkey Field).

It supports the Flood Risk – Summary for Members by examining whether the proposal meets the requirements of national and local planning policy that development must be safe for its location and must not increase flood risk elsewhere. In particular, it addresses the tests set out in the National Planning Policy Framework, including paragraphs 181 and 182.

This appendix focuses on:

- The physical and subsurface characteristics of the application site;
- The drainage strategy and Flood Risk Assessment submitted by the applicant;
- The limitations, assumptions and caveats contained within the applicant's own technical evidence; and
- Relevant evidence from comparable adjacent sites and statutory consultation responses.

This appendix does not seek to replicate or replace the applicant's Flood Risk Assessment, nor does it provide a detailed alternative drainage design. Its purpose is to assess whether the application, on the basis of information currently before the Council, demonstrates compliance with planning policy at the point of determination.

NWAG commissioned an independent expert Technical Note on Flood Risk Management, prepared by David Palmer CEng FICE and dated 18 January 2026 (see A6.8 and enclosed technical note.

A6.2 Site Description and Physical Constraints

The application site lies at the lowest point within the Westwells catchment, immediately downslope of existing development. Its sensitivity to changes in runoff volumes and routing is therefore a defining constraint, as set out in

The site is underlain by historic quarry and mine workings associated with Sands Quarry. These workings are known to have flooded historically and remain abandoned. Their extent, condition and hydraulic behaviour are not fully known.

These physical characteristics impose constraints on surface-water management that differ materially from unconstrained greenfield sites and must be taken into account when assessing flood risk and drainage feasibility.

A6.3 Underground Mine Workings – Condition, Ownership and Risk

The Donkey Field is undercut by one or more abandoned underground mine workings, which were historically subject to persistent flooding which was a material factor in the abandonment of Sands Quarry in 1912.

The mine workings are owned by the Ministry of Defence. No comprehensive mine survey or condition assessment has been undertaken as part of the current application. The precise extent, interconnectivity, stability and hydraulic behaviour of the workings therefore remain uncertain.

The applicant's own geophysical and drainage documentation acknowledges that, in the absence of a full mine survey, conclusions regarding ground conditions, infiltration performance and drainage behaviour are preliminary and may be invalidated by further investigation.

In flood-risk terms, the presence of unsurveyed flooded voids beneath the site introduces uncertainty as to:

- Whether infiltrated water may accumulate within the mine system;
- Whether groundwater levels may be seasonally elevated;
- Whether downstream pumping or discharge rates could be affected; and
- Whether changes in groundwater behaviour could alter flood risk beyond the site boundary.

A6.4 Review of the Applicant's Flood Risk Assessment and Drainage Strategy

The applicant's Flood Risk Assessment identifies the site as being within Flood Zone 1 and proposes a drainage strategy based primarily on infiltration, supplemented by rainwater harvesting.

The strategy is described as a hybrid solution, with excess surface water intended to discharge to ground via soakaway features, subject to confirmation of infiltration suitability and the outcome of any future mine survey.

While initial ground investigations are cited in support of the approach, the applicant's documentation makes clear that:

- Additional infiltration testing is required;
- Long-term groundwater monitoring has not been completed; and
- The influence of underground mine workings has not been fully assessed.

The drainage strategy therefore remains dependent on future investigations and approvals and has not been demonstrated as technically deliverable at the point of determination.

A6.5 Limitations and Caveats in the Applicant's Evidence

The applicant's own technical consultants explicitly caution that their conclusions are preliminary and subject to change pending further information. These caveats relate directly to matters central to flood-risk assessment, including infiltration feasibility and subsurface behaviour.

In planning terms, these caveats are material. A proposal that relies on future surveys, testing or design changes has not demonstrated compliance with flood-risk policy at the point when consent is sought.

The presence of acknowledged uncertainty does not merely represent a residual risk to be managed by condition; it goes to the core question of whether a safe and policy-compliant drainage solution has been established at all.

A6.6 Evidence from Adjacent and Comparable Sites

Relevant evidence from immediately adjacent and upslope sites indicates that infiltration-led drainage assumptions have not performed as anticipated in practice.

At the ARK Hawthorn data centre site, infiltration testing failed, and surface-water drainage has relied on fragile legacy infrastructure and unresolved discharge routes. Conditions attached to that permission relating to drainage remain outstanding, despite construction having commenced.

Observed outcomes at these locations reduce confidence that infiltration-based strategies can be relied upon without robust, site-specific proof.

A6.7 Ministry of Defence Position and Consultation Constraints

The Ministry of Defence, as owner of the underground mine workings, was consulted late in the planning process. Its response makes clear that conclusions are based on the application documents as submitted and that any amendments or additional information may materially alter its position.

In the absence of a full mine survey and condition assessment, it is not possible to demonstrate that drainage proposals are compatible with the safeguarding requirements applicable to the underground assets.

The need for further investigation therefore has implications not only for flood risk and drainage, but also for deliverability and lawful implementation of the proposal.

A6.8 Flood Expert Report (Commissioned by NWAG)

NWAG commissioned an independent expert Technical Note on Flood Risk Management, prepared by David Palmer CEng FICE and dated 18 January 2026 .

Mr Palmer is a Chartered Engineer and Fellow of the Institution of Civil Engineers with 37 years' experience in Flood Risk Management. He has led flood risk and drainage strategy work on some of the UK's largest and most complex development projects and has been Water Group Director at consulting engineers Buro Happold since 2016.

The Technical Note has been prepared in an independent professional capacity. Mr Palmer is not acting on behalf of his employer, Buro Happold, and the views expressed do not represent a Buro Happold position. He has no commercial involvement in the proposed development and no financial interest in the outcome of the application.

Although Mr Palmer is a local resident, his conclusions are based solely on his professional review of the submitted evidence and relevant national and local flood risk policy.

The Technical Note provides a detailed review of the applicant's Flood Risk Assessment, Drainage Strategy, subsequent technical notes, and the Sequential Test. Its findings are clear and unequivocal.

The Technical Note identifies fundamental and systemic deficiencies in the Flood Risk Assessment, Drainage Strategy, and Sequential Test, which together prevent any reliable understanding of baseline or post-development flood risk.

The evidence base submitted in support of the application is materially incomplete in flood-risk terms and does not comply with the requirements of the National Planning Policy Framework or the expectations of the Lead Local Flood Authority

The independent expert concludes that these deficiencies are not matters of detail but of principle, and that deferring their resolution to planning conditions would be contrary to national policy and accepted flood risk management practice. In its current form, this application is not suitable for consent on flood risk grounds.

A6.9 Compliance with National and Local Flood Risk Policy

National planning policy requires that development should only be permitted where it can be demonstrated that flood risk will not be increased elsewhere and that surface water can be managed safely for the lifetime of the development.

On the basis of information currently before the Council, the application does not demonstrate compliance with these requirements because:

- The drainage strategy relies on unproven infiltration assumptions;
- Critical subsurface conditions remain unsurveyed;
- The applicant's own evidence acknowledges that conclusions are preliminary; and
- Comparable nearby sites have experienced drainage failure.

The presence of critical drainage uncertainty, even within Flood Zone 1, engages the requirement for a precautionary approach to decision-making.