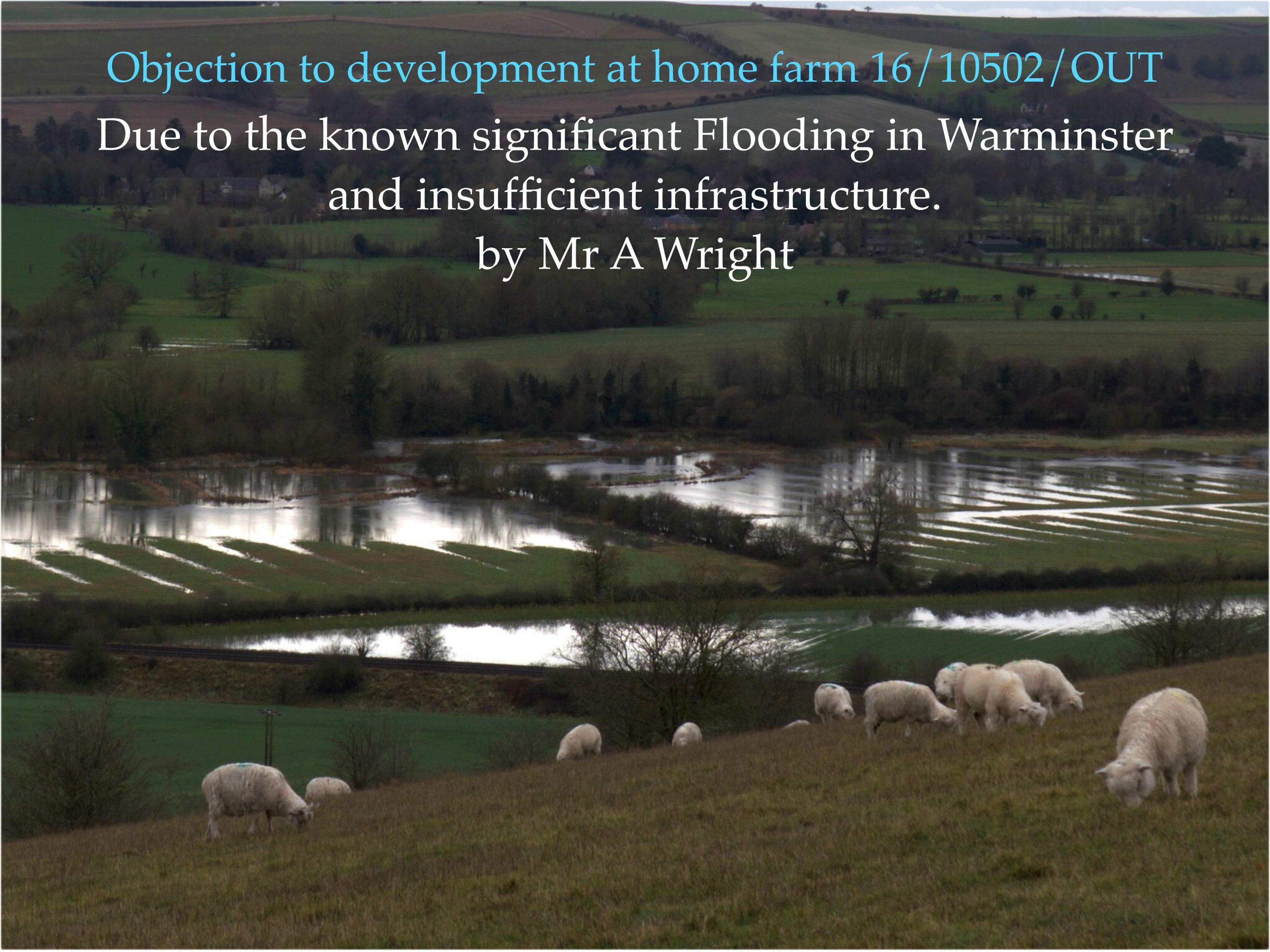


Objection to development at home farm 16/10502/OUT
Due to the known significant Flooding in Warminster
and insufficient infrastructure.
by Mr A Wright



Introduction and main objection, Flooding!

- Despite the known extreme flooding occurring along the valley bottom, no overall assessment of the causes and solutions has been undertaken. The extent of the flooding along the river shows the size of area effected being both Warminster, Bishopstrow and beyond, so it is not a simple blocked drain issue.
- The council has been given advice repeatedly by experts that 1200 properties are already at flood risk(DEFRA), and that no development should occur in Warminster without undertaking a sufficient town wide flood assessment such as a Strategic Flood Risk Assessment level 2, and a Surface Water Management Plan, to understand the current issues causing flooding and ensure development does not increase the flood risk to all (Environment Agency & Wiltshire Strategic Planners).
- The river floods over its banks, cause Unknown, the drains can't discharge once the river is full, the sewage system is combined with surface water, so with massive downpours it is often overwhelmed, allowing raw sewage into the SAC. Once development has been completed it claims to be able to limit discharge to a set rate, but the river and drainage systems are already past full capacity. Drainage from this site will always be an issue as all discharge points are below floodplain extent, which means during floods they are underwater and unable to work.

Additional reasons to object to this development.

- The site is outside the current and proposed new settlement boundary, is not allocated in the neighbourhood plan as a needed development site and is very close to a loud live fire military range, which is in regular use and will severely impact on living conditions for new tenants.
- Not assessed in local plan for impact on the area as the Sustainability Appraisal was limited to WUE.
- The site was not sequentially tested with other sites in the local plan and for it to be considered above other sites without being assessed under the same system shows bias. This would allow a site in a high risk flood area preference over safer locations.
- The council confirms it uses the SFRA for assessing developments. The SFRA requires evidence based proof of passing the sequential test and which sites were compared. This requires accurate flood details, these are known to be missing as the core strategy inspector stated, a SFRA 2 is needed prior to any other major developments outside the WUE, this has not been done.
- Insufficient infrastructure to cope with current population both in flood terms and school places, with no proof of a need for more housing by the local population that outweighs these issues.
- Coalescence with Bishopstrow causing a negative impact on conservation, historical context setting and the river Avon SAC, as nutrient discharge to the river is already high with no solutions being proposed.
- As the West Urban Extension was the only area assessed in the sustainability appraisal, the addition of this site, along with several other sites across the area, will trigger the requirement for a SEA test or Environmental Impact Assessment, due to the huge impact developing all open areas creates.

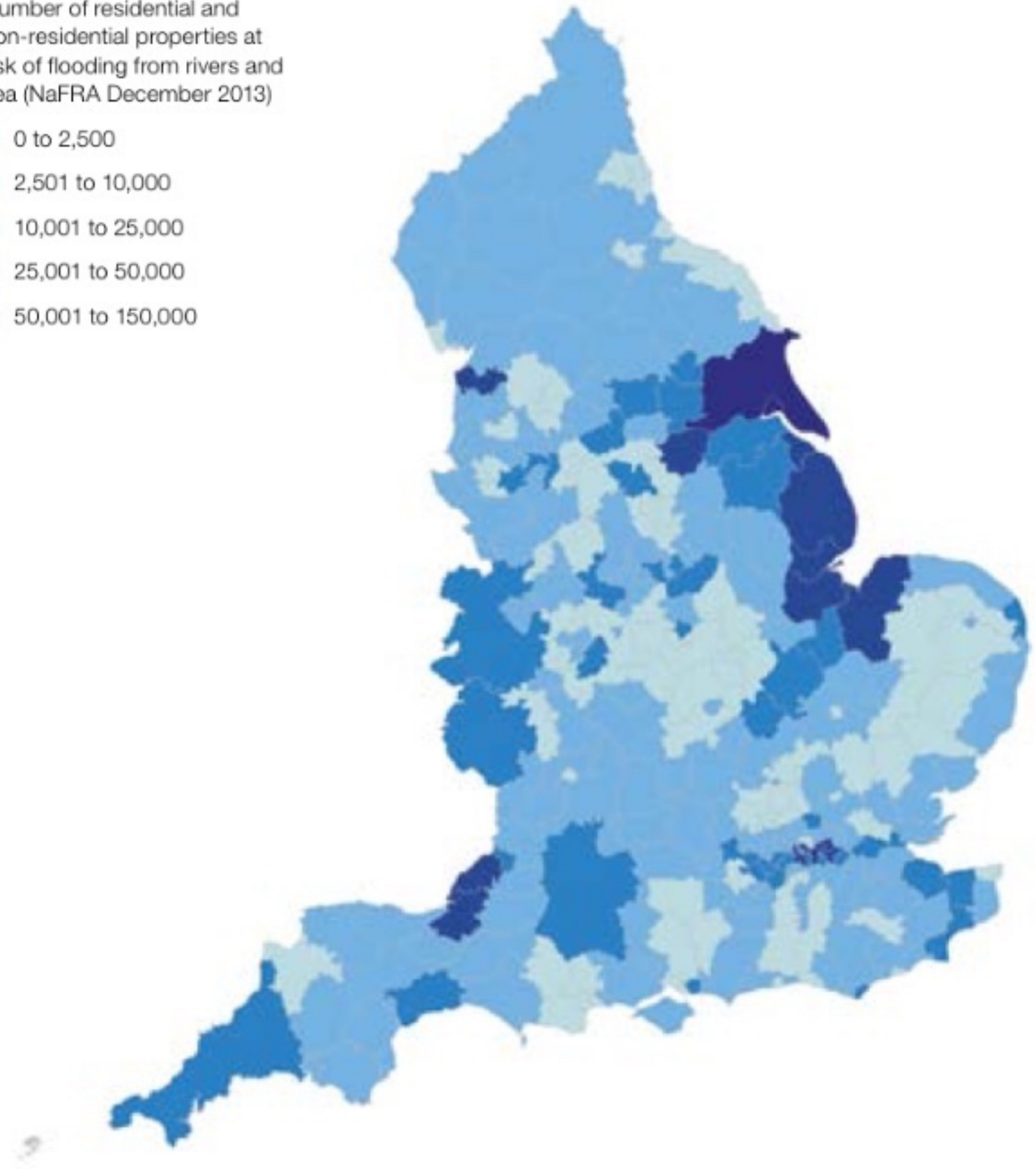
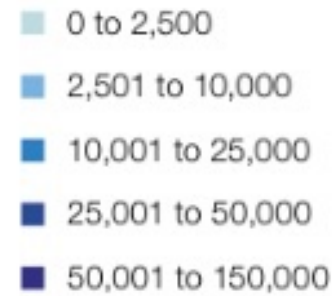
FLOOD RISK BY COUNTY

Wiltshire is shown as high flood risk, with only a few areas in the country being at higher risk.

Due to this high risk the NPPF states that using a SFRA 1 is inappropriate, and only areas that do not flood or have received a higher assessment of a SFRA 2 or SWMP can be safely sequentially tested.

Properties at risk of flooding in England

Number of residential and non-residential properties at risk of flooding from rivers and sea (NaFRA December 2013)



Notes

- 1 Includes both residential and non-residential properties.
- 2 NaFRA is the National Flood Risk Assessment Model.

Source: Environment Agency

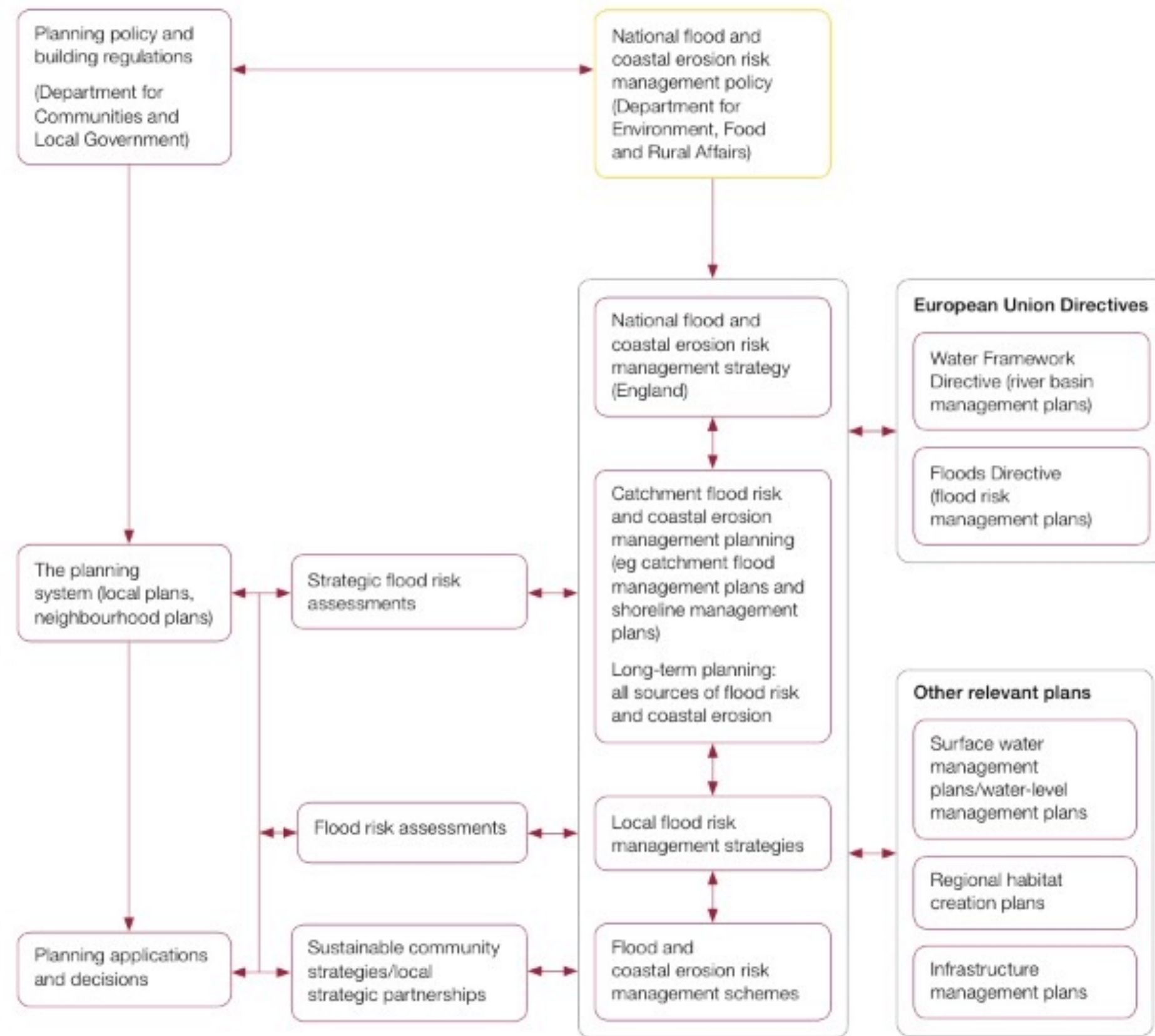
NATIONAL AUDIT OFFICE ADVICE.

This chart highlights the process and information sources expected to be used for efficient and cost effective flood prevention and management. Local councils as lead local flood authorities are responsible for assessing all sources of flooding, using the documents listed and additional information when required.

The NPFF, CFMP, SFRA and LFRMS are key. If flooding is repeated or from other sources than rivers additional assessments are required such as SFRA 2 and SWMP.

Flood and coastal erosion risk management strategies and plans and their relationship to planning initiatives

National

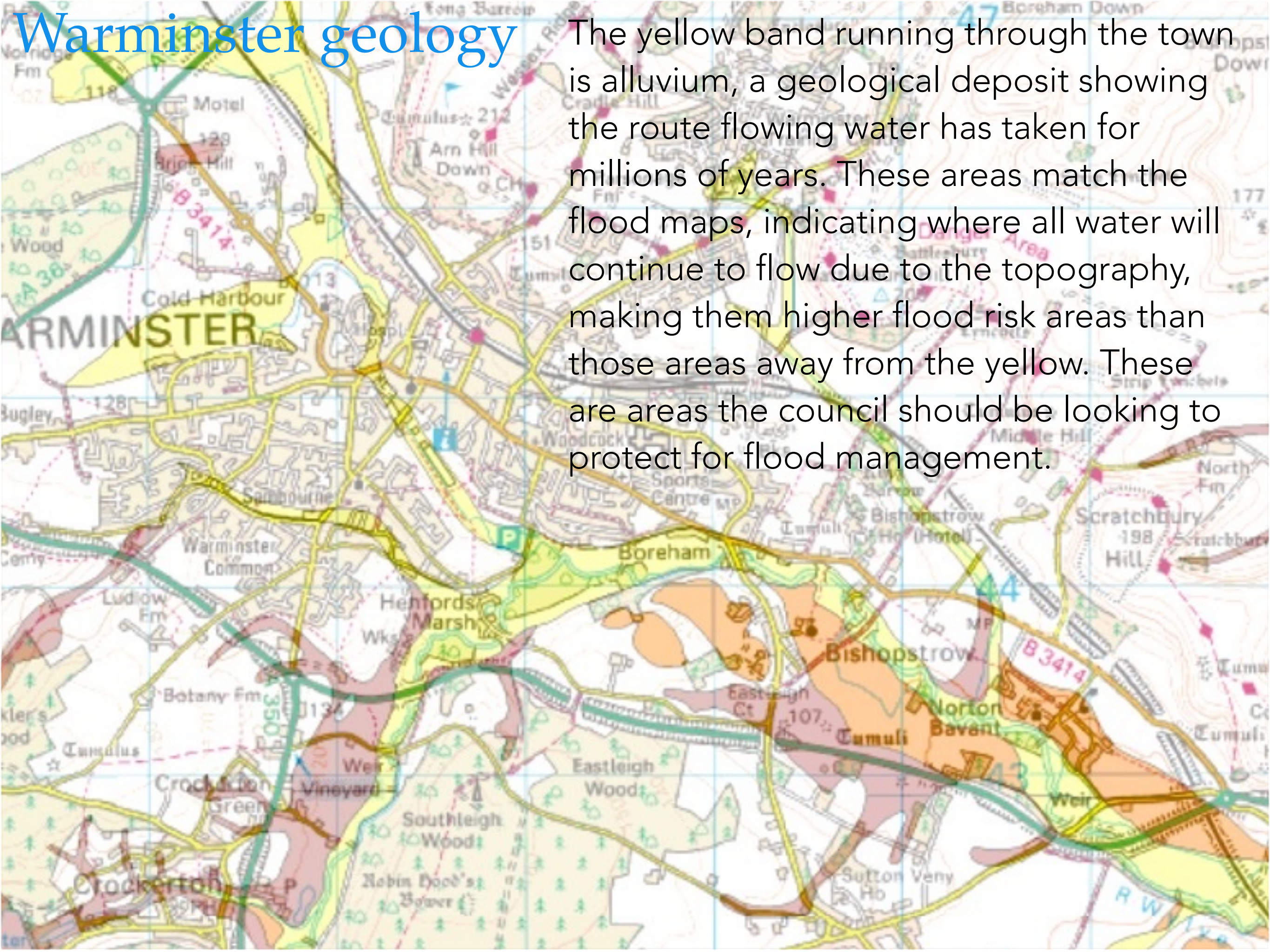


Local

Source: Environment Agency

Warminster geology

The yellow band running through the town is alluvium, a geological deposit showing the route flowing water has taken for millions of years. These areas match the flood maps, indicating where all water will continue to flow due to the topography, making them higher flood risk areas than those areas away from the yellow. These are areas the council should be looking to protect for flood management.



NPPF guidance on flood risk has three key stages, Assess, Avoid, Manage and Mitigate.

- **What is the general planning approach to development and flood risk?**
- The National Planning Policy Framework sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. The main steps to be followed are set out below which, in summary, are designed to ensure that if there are better sites in terms of flood risk, or a proposed development cannot be made safe, it should not be permitted.
- **Assess flood risk:**
- Local planning authorities undertake a Strategic Flood Risk Assessment to fully understand the flood risk in the area to inform Local Plan preparation
- In areas at risk of flooding or for sites of 1 hectare or more, developers undertake a site-specific flood risk assessment to accompany applications for planning permission (or prior approval for certain types of permitted development).

There are two Types of strategic flood risk assessments.

- The NPPF requires councils use the appropriate flood risk assessment.
- The flood risk assessment for Wiltshire is a SFRA 1.
- This assessment is only applicable to areas at little or no flood risk.
- The Council has followed this guidance for high risk areas, Salisbury, Trowbridge and Chippenham doing the required SFRA 2 to ensure adequate understanding of flood risk in each location. By failing to follow the same process in Warminster shows clear bias as Warminster is at greater surface water flood risk than Chippenham so why no assessment? considering surface water is insufficiently mapped or understood in the county.

Levels of Strategic Flood Risk Assessment	
	Description
Level 1	A Level 1 Assessment should be carried out in local authority areas where flooding is not a major issue and where development pressures are low. The Assessment should be sufficiently detailed to allow application of the Sequential Test to the location of development and to identify whether development can be allocated outside high and medium flood risk areas, based on all sources of flooding, without application of the Exception Test. The Environment Agency and lead local flood authorities can advise on the key outputs from a Level 1 Strategic Flood Risk Assessment.
Level 2	Where a Level 1 Assessment shows that land outside flood risk areas cannot appropriately accommodate all the necessary development, it may be necessary to increase the scope of the Assessment to a Level 2 to provide the information necessary for application of the Exception Test where appropriate – see Table 3. A Level 2 Strategic Flood Risk Assessment should consider the detailed nature of the flood characteristics within a flood zone including: • flood probability; • flood depth; • flood velocity; • rate of onset of flooding; and • duration of flood

EA advice to Wiltshire council as part of the Local Plans Sustainability Appraisal, and what additional measures are required to ensure sustainability.

"In our letters 17 July 2009 & 24 December 2009 we highlighted the need for a Level 2 SFRA for Warminster to identify the flood risk now and in the future, from all sources of flooding, and to inform an overarching strategy for the management of flood risk, particularly with respect to surface water drainage. We reminded you that our published Flood Map does not show the floodplain (Flood Zones) of watercourses with a catchment size less than 3km², therefore it is possible parts of the areas planned for growth may be at risk of fluvial flooding today, and in the future.

The spatial strategy set out for Warminster is not informed by a Level 2 SFRA, and hence there is no overarching strategy for the management of flood risk, in particular management of surface water. This should be considered before the Core Strategy is formally submitted.

Additional flood risk management infrastructure has not been identified, but it is possible that this may be required in the future to allow delivery of the strategic sites for housing and employment. Without a Level 2 SFRA it is not possible to know whether there are any additional infrastructure requirements."

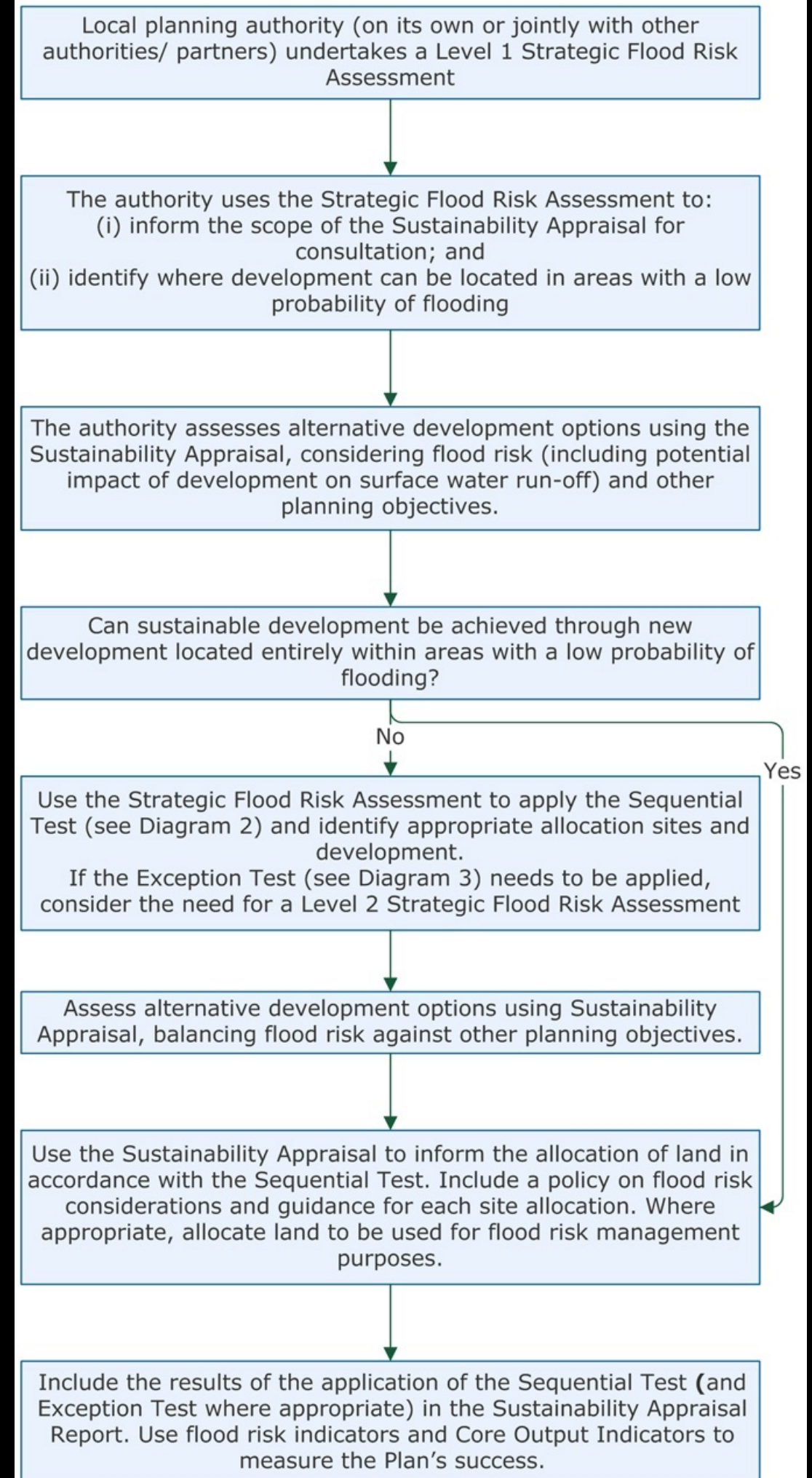
In 2015/16 the advice from the EA for Warminster neighbourhood plan was that a SFRA 2 is still needed.

The second stage of NPPF flood avoidance.

- **Avoid flood risk:**
- In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk. In plan-making this involves applying the 'Sequential Test' to Local Plans and, if needed, the 'Exception Test' to Local Plans.
- In decision-taking, where necessary, local planning authorities also apply the 'sequential approach'. In decision-taking this involves applying the Sequential Test for specific development proposals and, if needed, the Exception Test for specific development proposals, to steer development to areas with the lowest probability of flooding.

The Local planning authority is requirement to use the sequential test to avoid flood risk areas.

- The flow chart shows how to assess areas for development. It relies on adequate strategic assessment of all flood risk to an area in order to apply the sequential test which aims to avoid higher risk areas. As indicated earlier areas at greater flood risk require more investigation to understand the causes of flooding, a SFRA 2 or SWMP allows them to accurately apply the sequential test.
- In addition it requires the Sustainability Appraisal to be used and the one for Warminster requires a SFRA 2 to be done. This site was not sequentially tested in the local plan as required, and has not been compared to other sites to prove it is less effected by flooding both on and off site. The Flood Risk Assessment provided by the developer only assesses risk on site and fails to prove there is capacity in the flood infrastructure for its additional discharge amounts.



Sites assessed in local plan and constraints.

Map 1 below shows SHLAA sites used.

Map 2 indicates floodplain (rivers only)

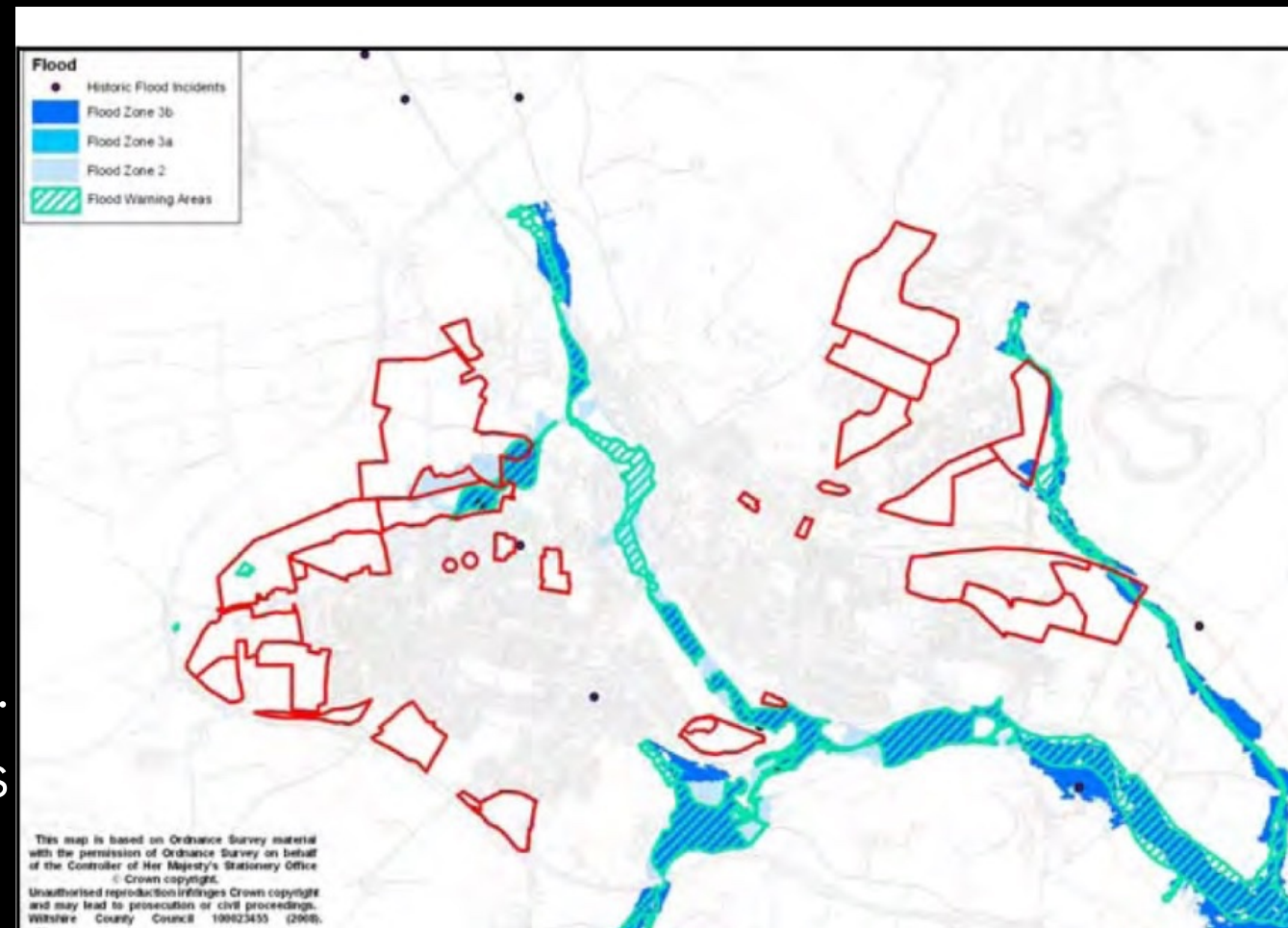
Map 3 farm land(yellow), military(gray), conservation areas (purple).

Map 4 SSSI protected areas (green).

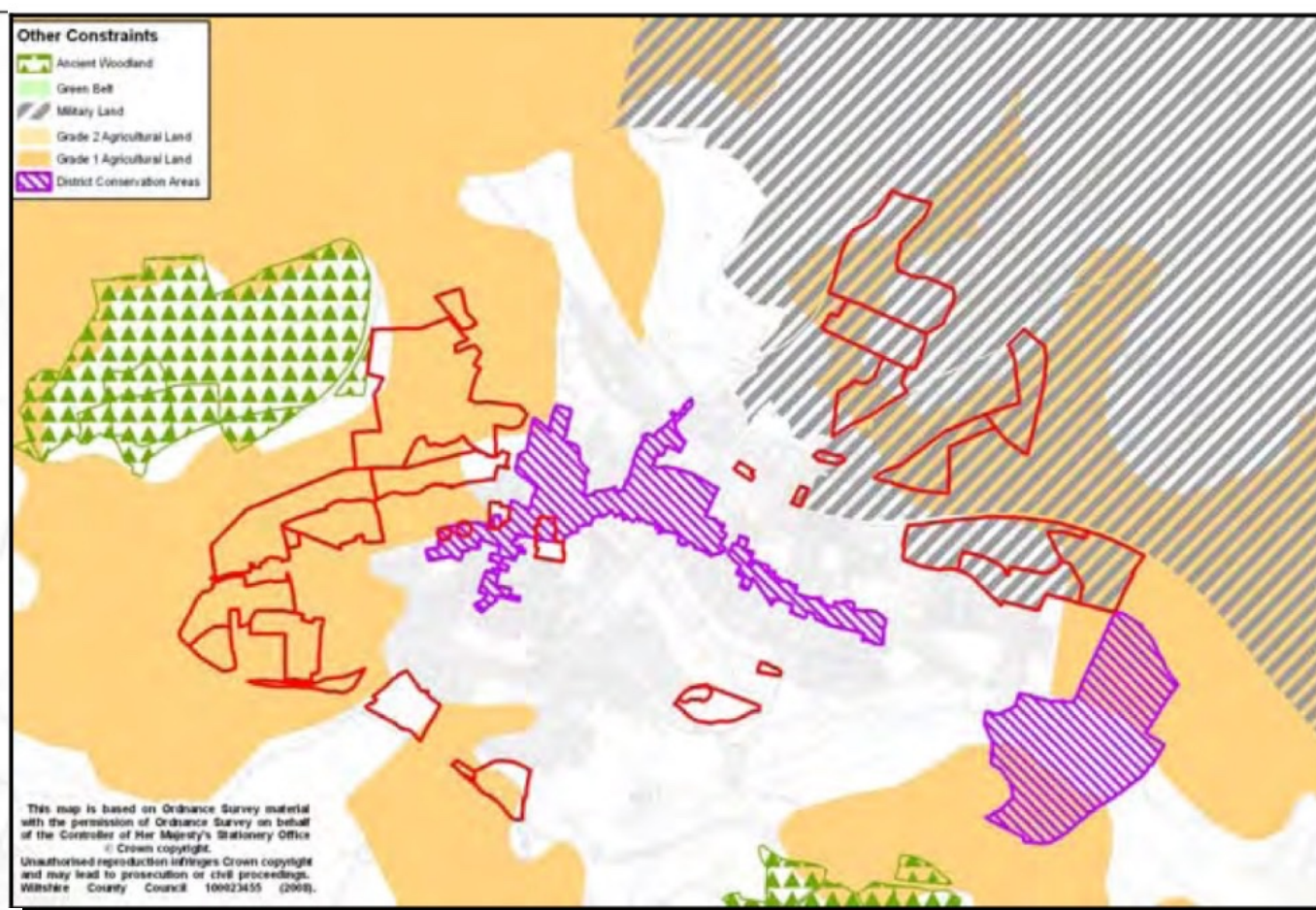
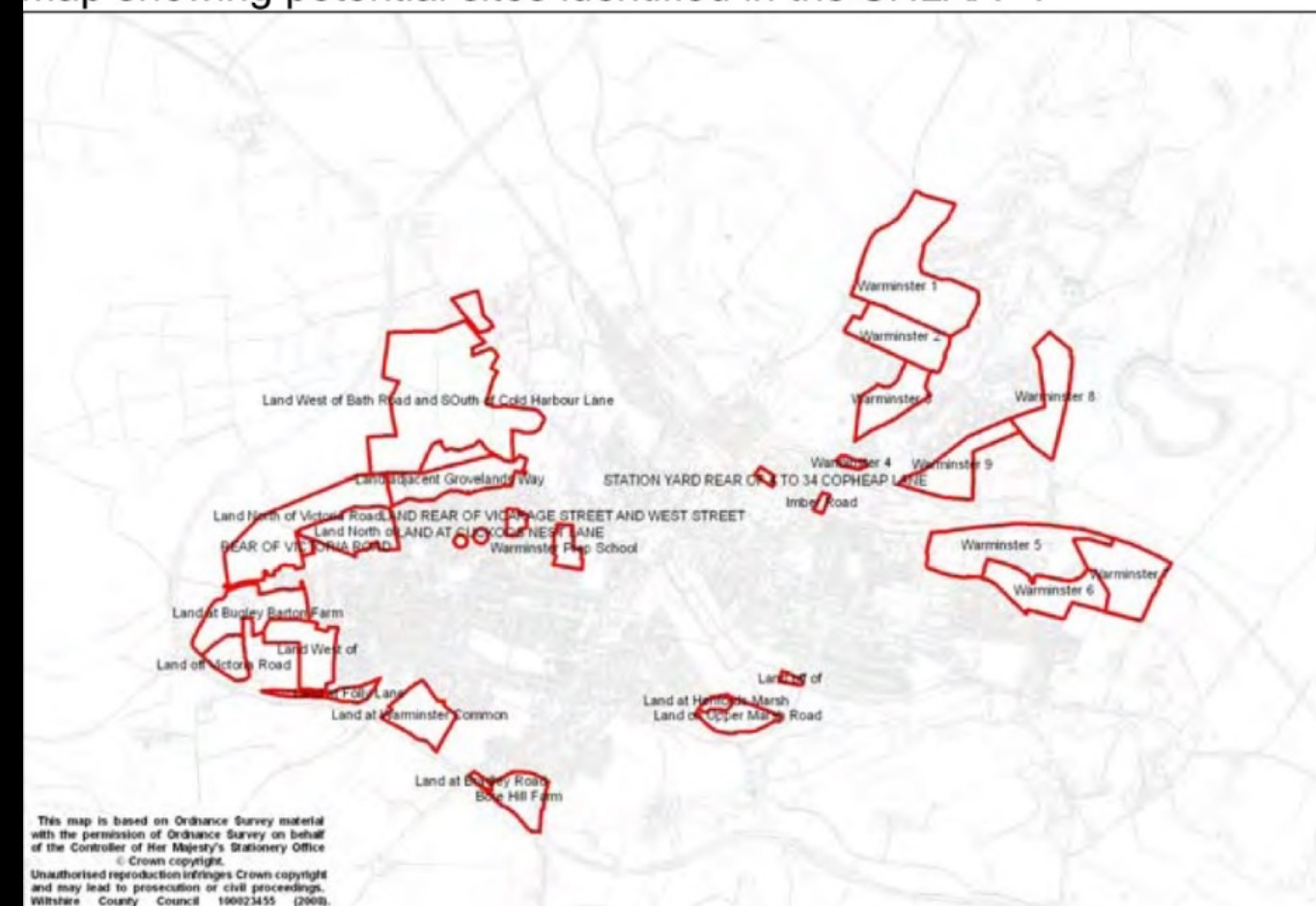
Map 5 surface water flooding extent.

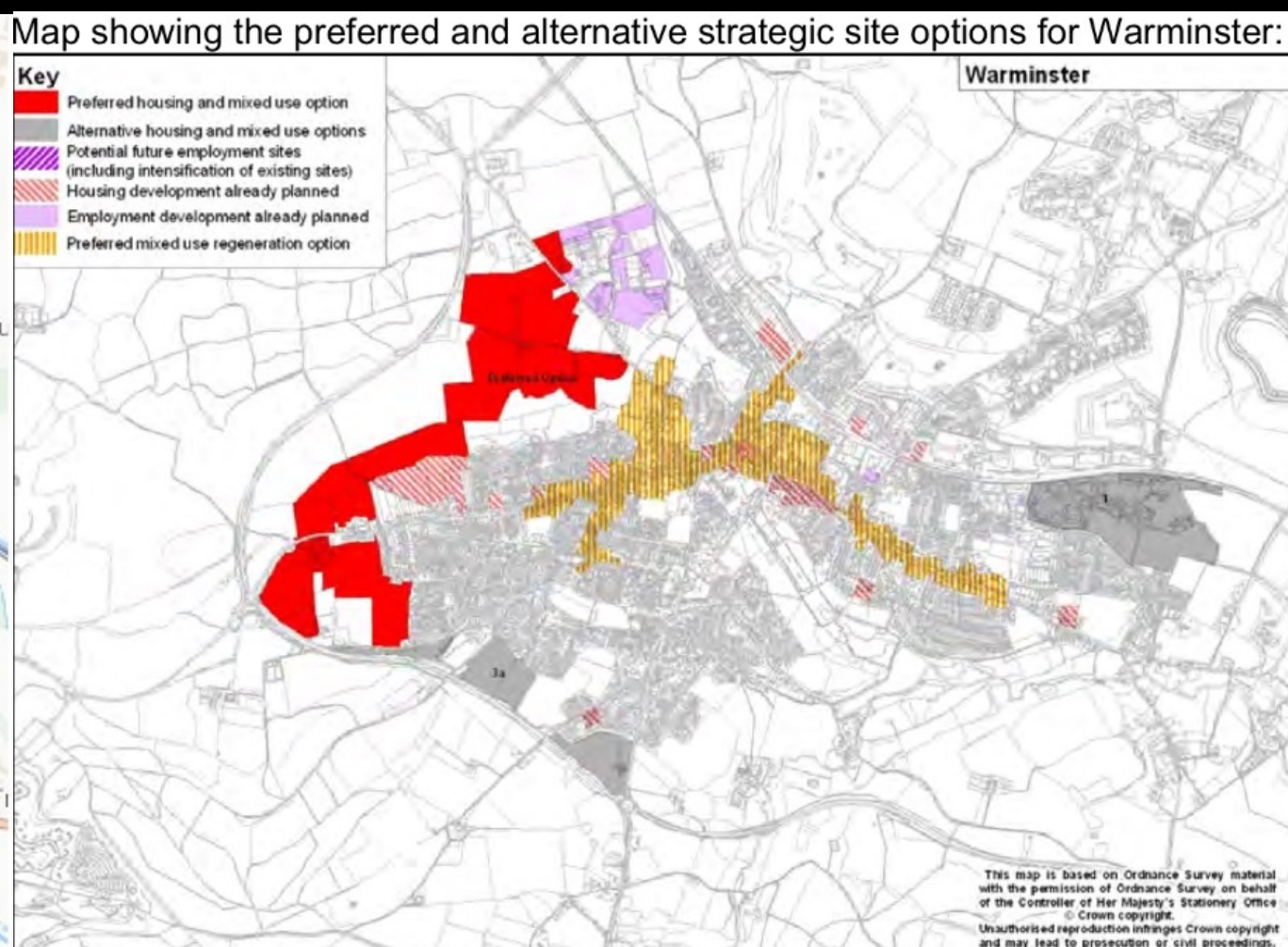
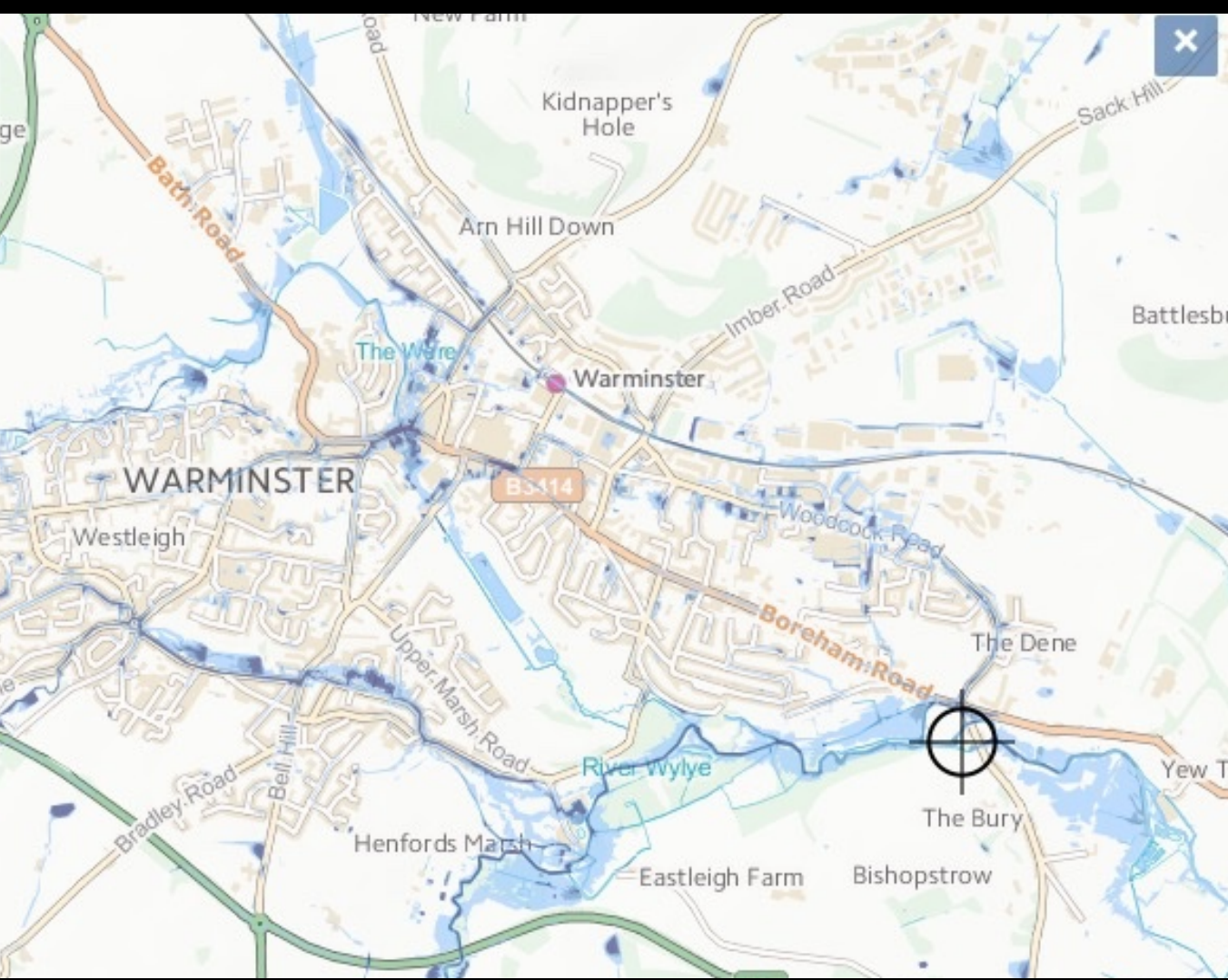
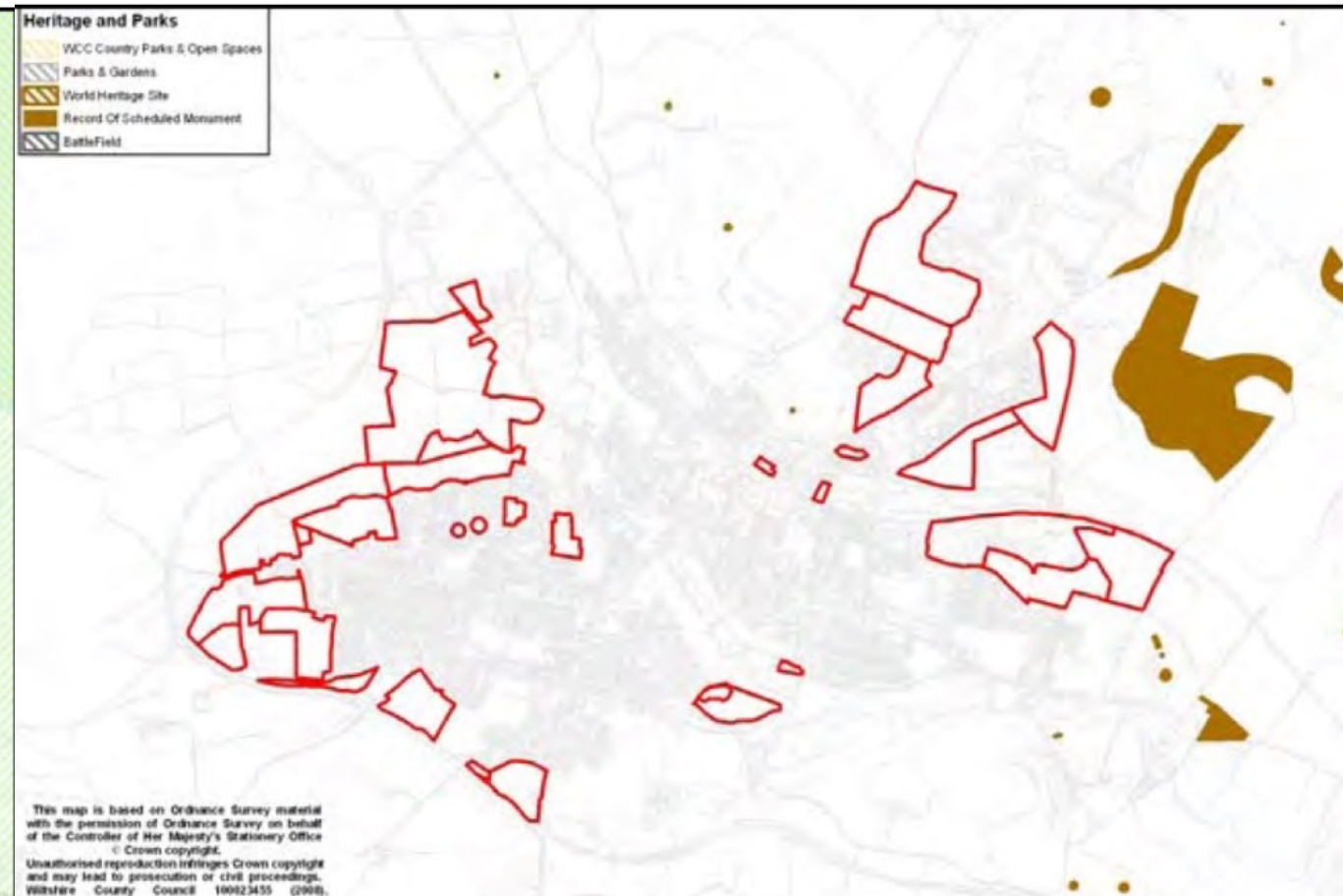
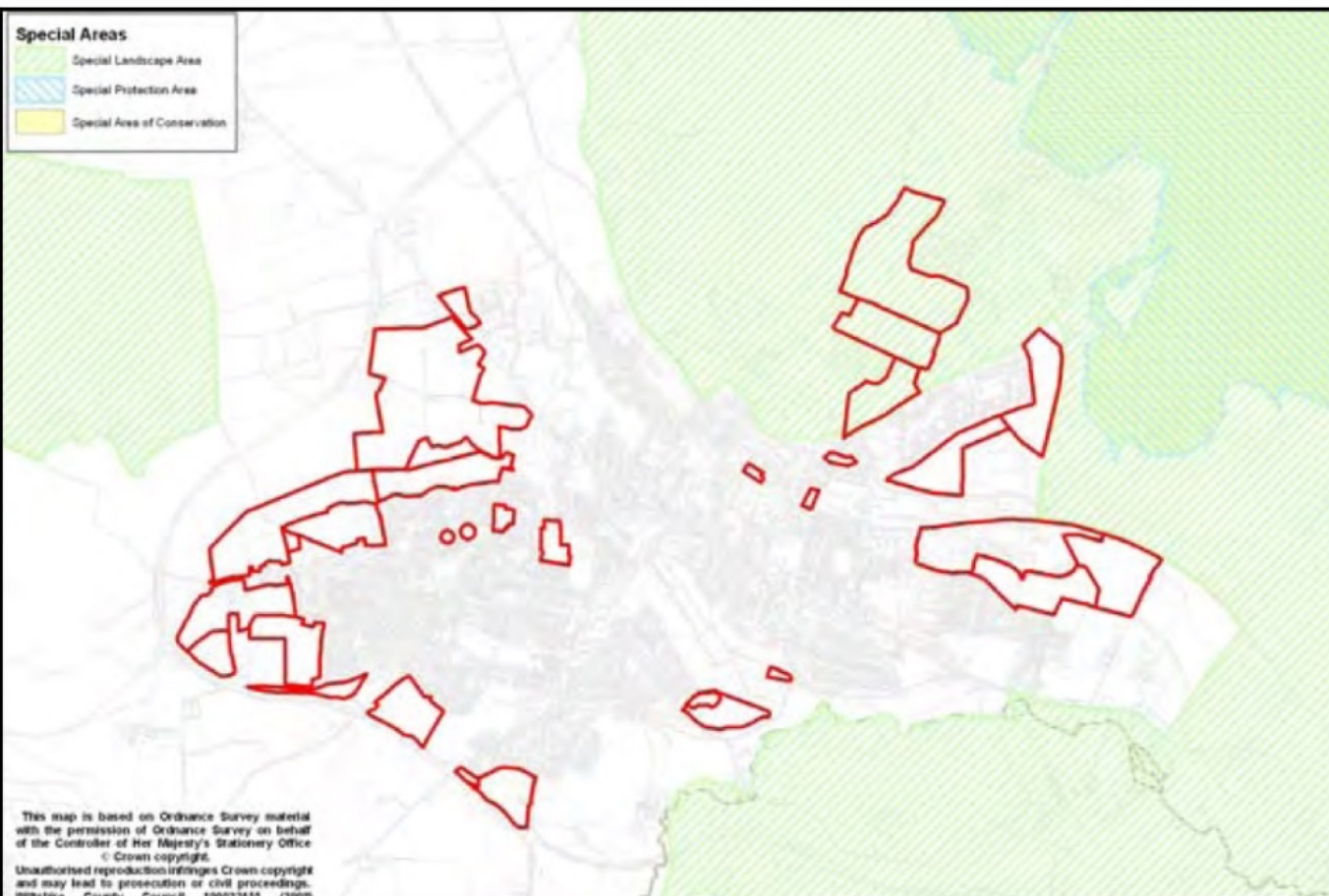
Map 6 scheduled ancient monuments (brown).

Map 7 chosen strategic site due to policy aims and location constraints (red).

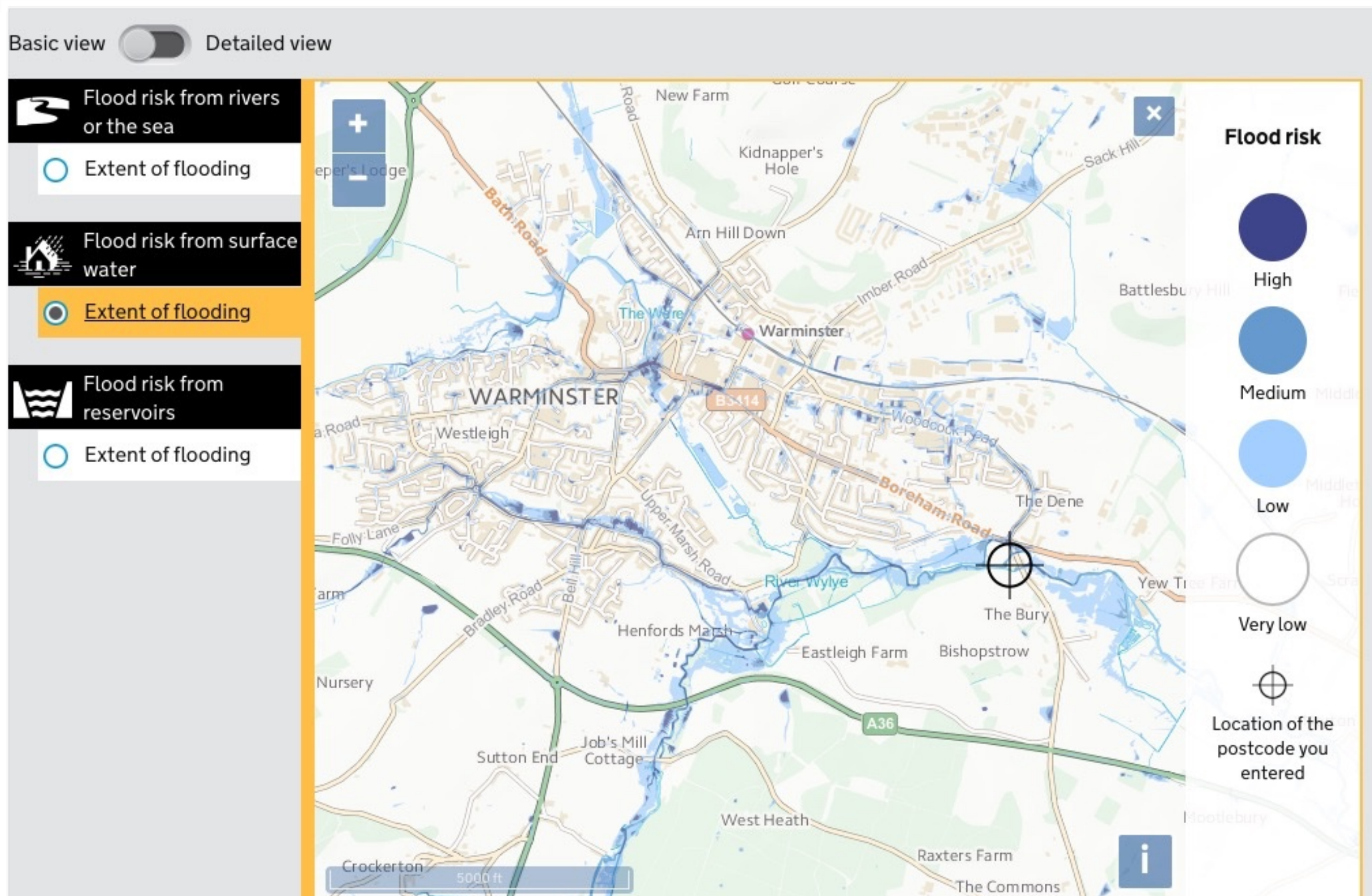


Map showing potential sites identified in the SHLAA³⁰:





Flood map for Warminster town by the EA showing large areas of the town effected by surface water flooding not accounted for in flood zone designations.



The NPPF stage three: requires areas known to be at flood risk to be managed and residual risks to be understood and mitigated.

- **Manage and Mitigate flood risk:**
- Where development needs to be in locations where there is a risk of flooding as alternative sites are not available, local planning authorities and developers ensure development is appropriately flood resilient and resistant, safe for its users for the development's lifetime, and will not increase flood risk overall.
- Local planning authorities and developers should seek flood risk management opportunities (e.g. safeguarding land), and to reduce the causes and impacts of flooding (e.g. through the use of sustainable drainage systems in developments).

CORE STRATEGY 2016

Wiltshire council confirms it will use NPPF advice, the SFRA, the sequential test and follow best practice for flood risk management which as indicated in the core strategy is to do more assessment in Warminster.

Core Policy 67

Flood Risk

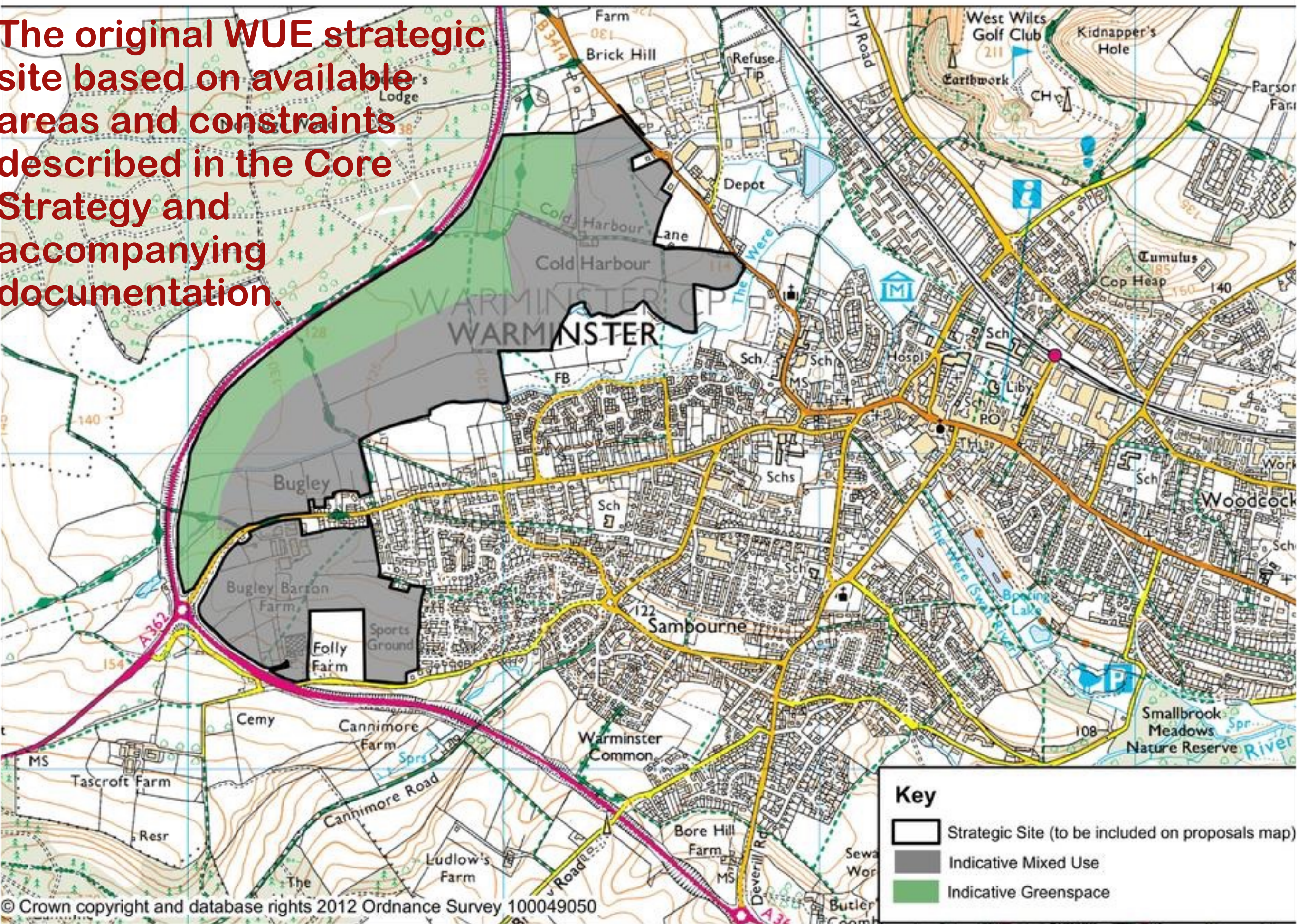
Development proposed in Flood zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.

All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

CORE STRATEGY FLOOD RISK

- P307
- 6.179 The Strategic Housing Land Availability
- Assessment (SHLAA) demonstrates that there is sufficient land available in Flood Zone 1, the zone of least risk, to meet the proposed housing requirement of 42,000 new homes for the area. The strategy therefore favours housing development in Flood Zone 1 over areas of higher risk as identified by the Strategic Flood Risk Assessment (SFRA).
- 6.180 Proposals put forward in areas of higher risk (Flood Zones 2 and 3) will need to be supported by clear evidence that no lower risk alternative sites are available. The findings of the SHLAA will carry considerable weight when testing the suitability of proposals put forward in higher risk areas.

The original WUE strategic site based on available areas and constraints described in the Core Strategy and accompanying documentation.



WARMINSTER WEST URBAN EXTENSION STRATEGIC PLANNING DETAILS.

- 900 dwellings and 6 ha of employment.

KEY OBJECTIVES:

- To deliver a high quality mixed use urban extension providing 40% affordable housing and a suitable mix of housing in line with Core Policies 45 and 46.
- Development that is integrated with the existing town and town centre.
- Protection of the setting of and views to the West Wiltshire Area of Outstanding Natural Beauty (AONB).
- To contribute towards the development and implementation of a Phosphates Management Plan, or a suitable on-site alternative, to compensate for additional phosphate loading from sewage discharges to the River Avon.
- To reduce the risk of flooding in and around Warminster through a robust and inclusive planning process, and implementing Sustainable Urban Drainage measures.
- To ensure the environment within and around the strategic site is conserved and enhanced.

INFRASTRUCTURE REQUIREMENTS

- Development of the site will be required to meet the infrastructure and sustainable planning requirements outlined below. Further detail can be found in the Infrastructure Delivery Plan (IDP).

PHYSICAL REQUIREMENTS

- Developer contributions towards the implementation of a Phosphate Management Plan or a suitable on-site alternative.
- A Level 2 Strategic Flood Risk Assessment must be undertaken prior to any subsequent planning application process.
- A Surface Water Management Planning process must be undertaken to fully support any subsequent planning application process. The Surface Water Management Plan should consider all aspects of the local flood regime and aim to:
 - Bolster the telemetry modelling work being undertaken by the council during 2012;
 - Incorporate recommendations from the study to reduce and, where possible, remove flood risk from existing development;
 - Provide accurate and robust data to assist the council (as Lead Local Flood Authority) and the Environment Agency to undertake further detailed modelling of local catchment flood processes; and
 - Ensure that the catchment works as a whole and not isolated site specific mitigation measures are incorporated into any subsequent detailed master planning exercise.
 - Flood mitigation measures must provide appropriately designed sustainable drainage systems and, where appropriate, aim to improve existing capacity.
- Capacity of the drainage network should be fully assessed and appropriately augmented to ensure the risk of flooding is not increased elsewhere as a consequence of development.
- Essential capacity improvements to the public sewer network.
- Financial contributions for off-site water supply improvements and new sewage apparatus required to serve the site.
- Reinforcement of the electricity network and connection to the existing low pressure and gas mains network.
- A Sustainable Energy Strategy will be required for the site, in accordance with proposed Core Policy 41.

Despite the strategic plan setting the number of new houses in the WUE to 900, this number has been increased to over 1400. In addition Grovelands, not in the local plan, is in zones 2/3, an area deliberately avoided to help manage serious flooding, has applied for their site of over 150 units to be developed, without the SFRA 2 or SWMP as required in the strategic plans. Using high risk flood areas that we need to protect for flood management puts the entire community at risk.

The map illustrates the proposed development at Grovelands Way, showing residential buildings, roads, and green spaces. It highlights flood zones and infrastructure elements like bridges and bus stops. Key features include:

- Flood Zones:** Labeled B1 through B6, indicating different levels of flood risk.
- Infrastructure:** Includes West Warminster Urban Extension, Grovelands Way, and various bridges and bus stops.
- Development:** Shows existing and proposed housing units, along with public open spaces and landscaping.
- Legend:** Provides a key for symbols used on the map, such as stream, bridge, bus stop, and flood zones.
- Scale:** A scale bar indicates distances from 0 to 50 meters.

NTINUING CARE RETIREMENT COMMUNITY (CCRC)

PROPOSED CCRC DEVELOPMENT AT GROVELANDS WAY_V

Planning inspector comments on Core Strategy

- Development proposals in the Warminster Community Area will need to demonstrate how the relevant those issues and considerations listed in paragraph 5.155 will be addressed.

5.155

- Development in the vicinity of the River Avon (Hampshire) or Salisbury Plain must incorporate appropriate measures to ensure that it will not adversely affect protect the habitats, species and processes which maintain the integrity of these Special Areas of Conservation Natura 2000 sites
- A more detailed Strategic Flood Risk Assessment (Level 2) is needed to provide a robust understanding of flood risk and inform decisions about the town's growth and appropriate selection of sites for development . The strategic allocation can be delivered in advance of the result of this assessment. Such work should consider all aspects of flood risk and, where practicable, the scope of the assessment should be agreed with the Council and Environment Agency.

Planning inspectors comments continued

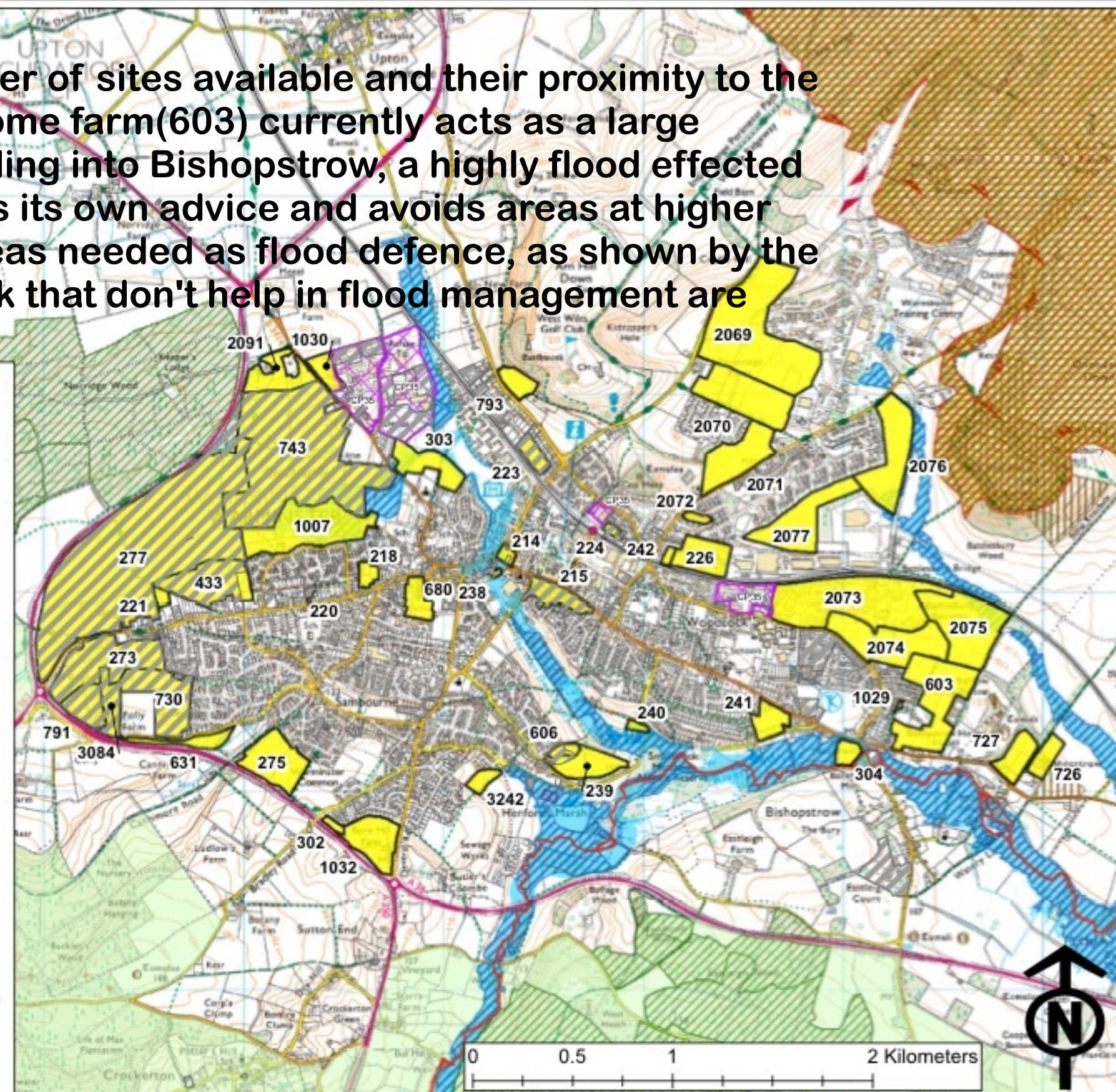
- Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that already delivered or committed at April 2011) and at least 1,770 approximately 2,060 new homes will be provided. Of these about 1,920 1,650 dwellings should occur at Warminster, including land identified to the west of Warminster, between the existing built form and the A350 for strategic growth
- Approximately 140/120 homes will be provided in the rest of the community area. Non-strategic development Growth in the Warminster Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.
- Development proposals in the Warminster Community Area will need to demonstrate how the relevant issues and considerations listed in paragraph 5.155 will be addressed.
- To deliver a high quality mixed use urban extension providing 30% 40% affordable housing and a suitable mix of housing in line with Core Policies 45 and 46.
- Development that is integrated with the existing town ...
- Flood risk assessment required to ensure that development is not encroaching within Flood Zones 2 or 3 and to inform the sequential test. A Surface Water Management Planning process.

SHLAA sites: Warminster

This map shows the number of sites available and their proximity to the mapped flood sources. Home farm(603) currently acts as a large storage area limiting flooding into Bishopstrow, a highly flood effected area. If the council follows its own advice and avoids areas at higher risk, and also protects areas needed as flood defence, as shown by the map other sites less at risk that don't help in flood management are available.

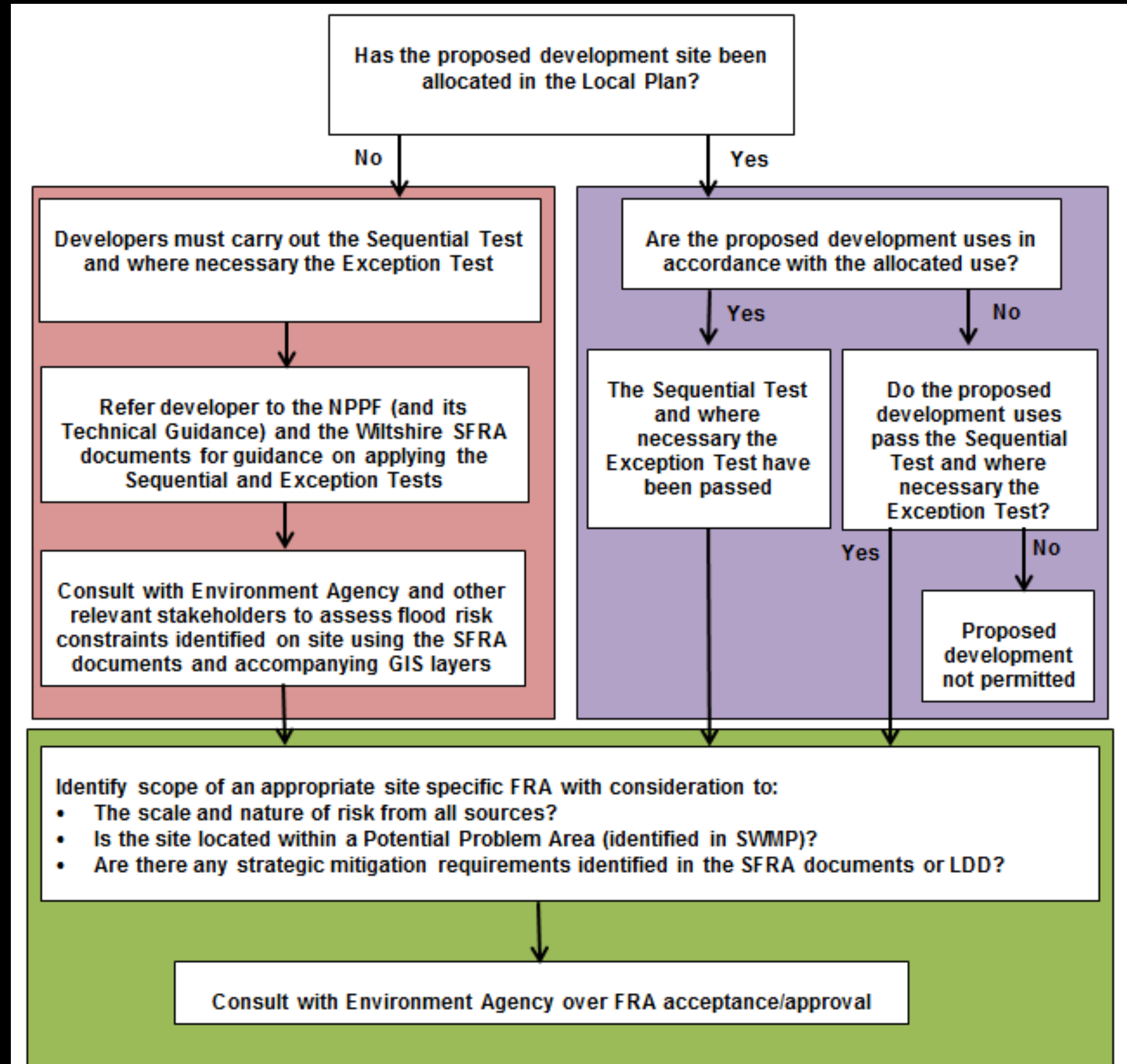
Legend

-  SHLAA sites
-  Principal Employment Area CP35
-  Green Belt
-  National Parks
-  Special Area of Conservation (SAC)
-  Special Protection Area (SPA)
-  Site of Special Scientific Interest (SSSI)
-  Parks and Gardens
-  National Nature Reserves
-  Ancient Woodland
-  Scheduled Monuments
-  World Heritage Site (WHS)
-  RAMSAR
-  Flood Zone 3
-  Flood Zone 2
-  Area of Outstanding Natural Beauty (AONB)
-  Mineral Safeguarding Area (MSA)
-  Completions and commitments



Wiltshire councils SFRA 1 advice for developers.

- The SFRA states councils and developers must demonstrate their site meets the required standards and document the process with the sequential test as home farm has not been assessed in the local plan.
- An appropriate FRA would have to consider the current flooding causes around the site, cutting road access and flooding other properties, how the lost flood storage at home farm will effect this, if there is capacity in the system to accommodate more water? It doesn't.

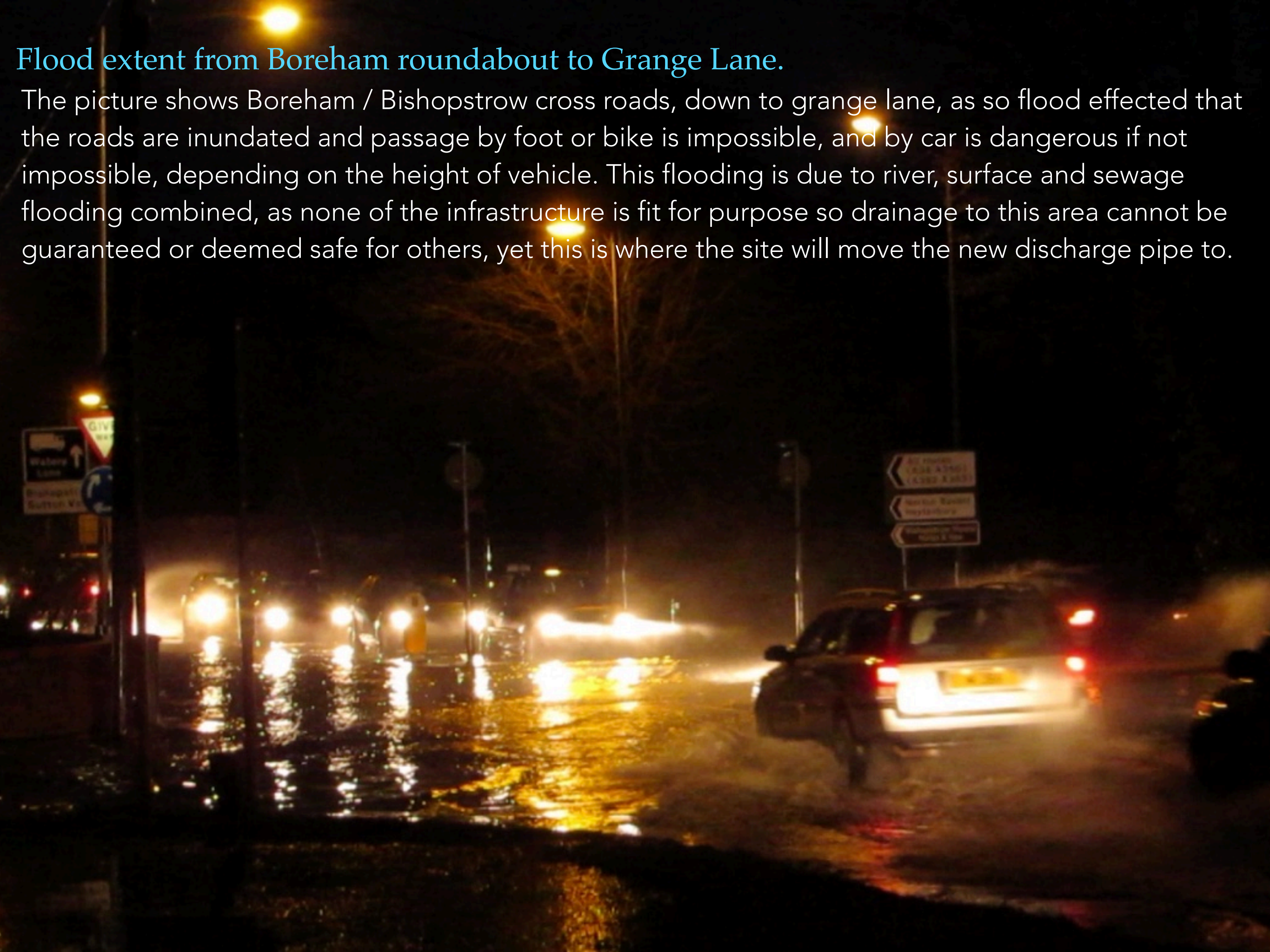


Nppf sequential test process uses all information to pick the most appropriate sites to develop, and those that need protecting as part of the flood management strategy.

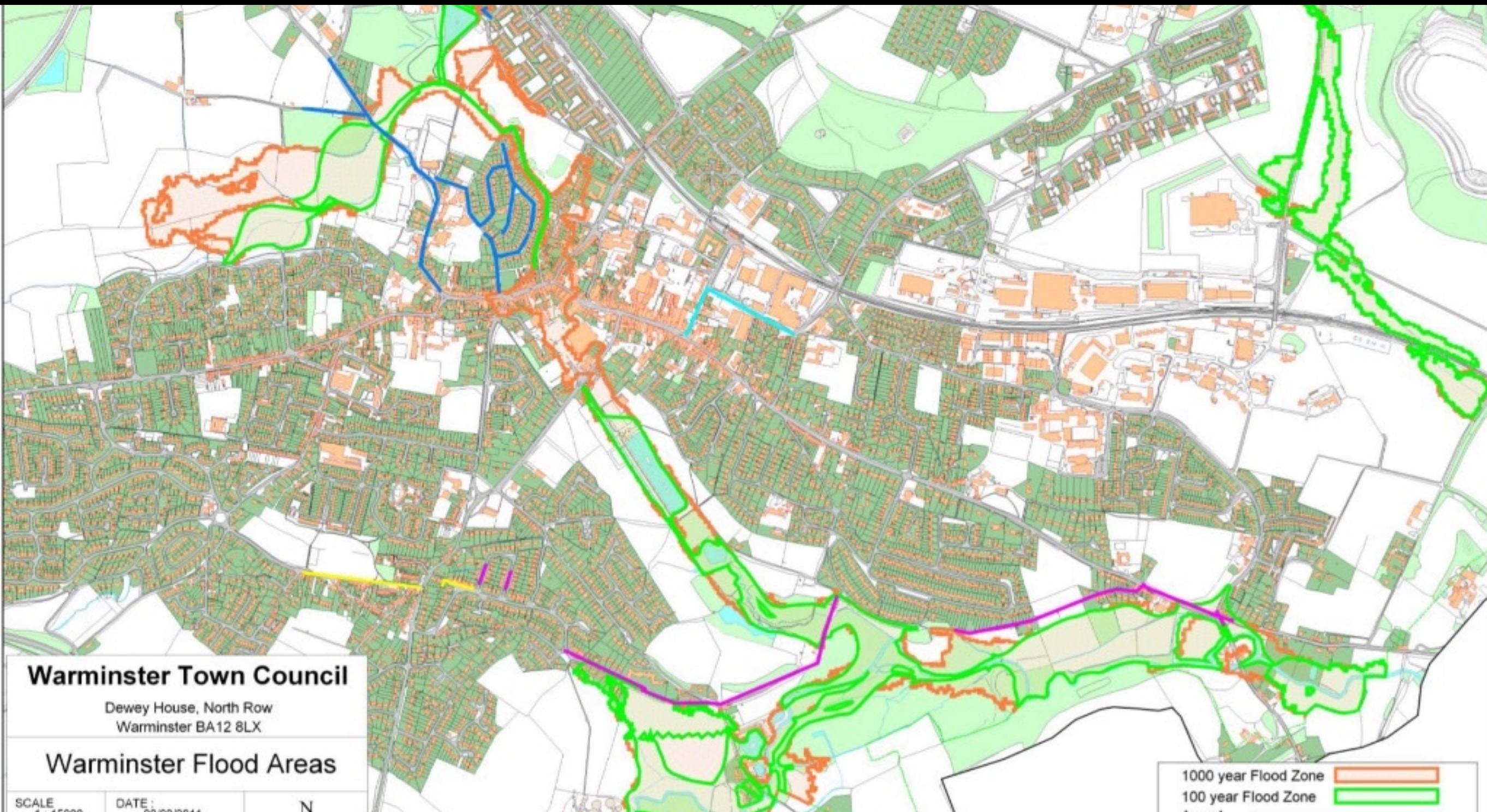
- **What is the sequential, risk-based approach to the location of development?**
- This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.
- Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, other forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.

Flood extent from Boreham roundabout to Grange Lane.

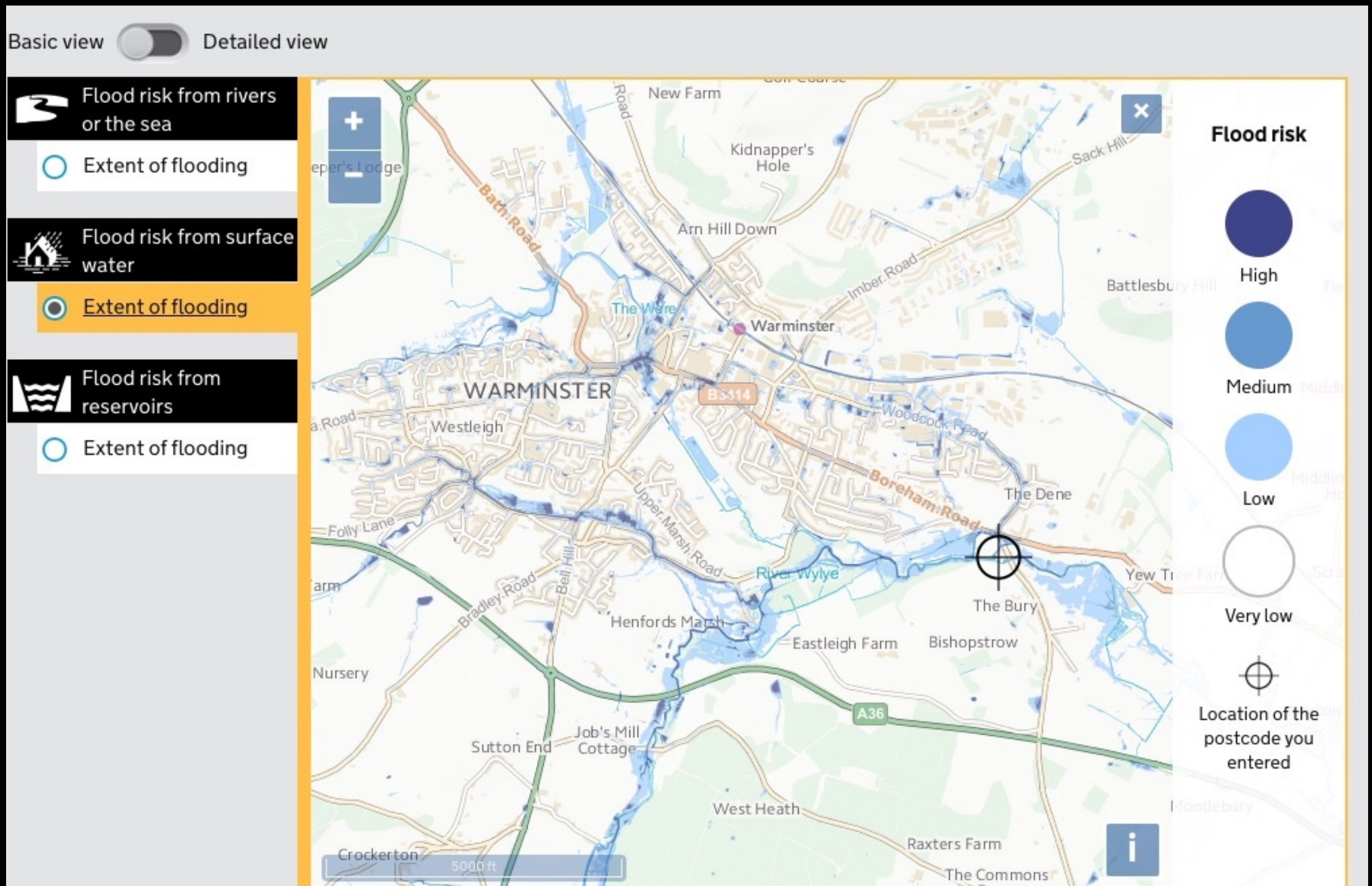
The picture shows Boreham / Bishopstrow cross roads, down to grange lane, as so flood effected that the roads are inundated and passage by foot or bike is impossible, and by car is dangerous if not impossible, depending on the height of vehicle. This flooding is due to river, surface and sewage flooding combined, as none of the infrastructure is fit for purpose so drainage to this area cannot be guaranteed or deemed safe for others, yet this is where the site will move the new discharge pipe to.



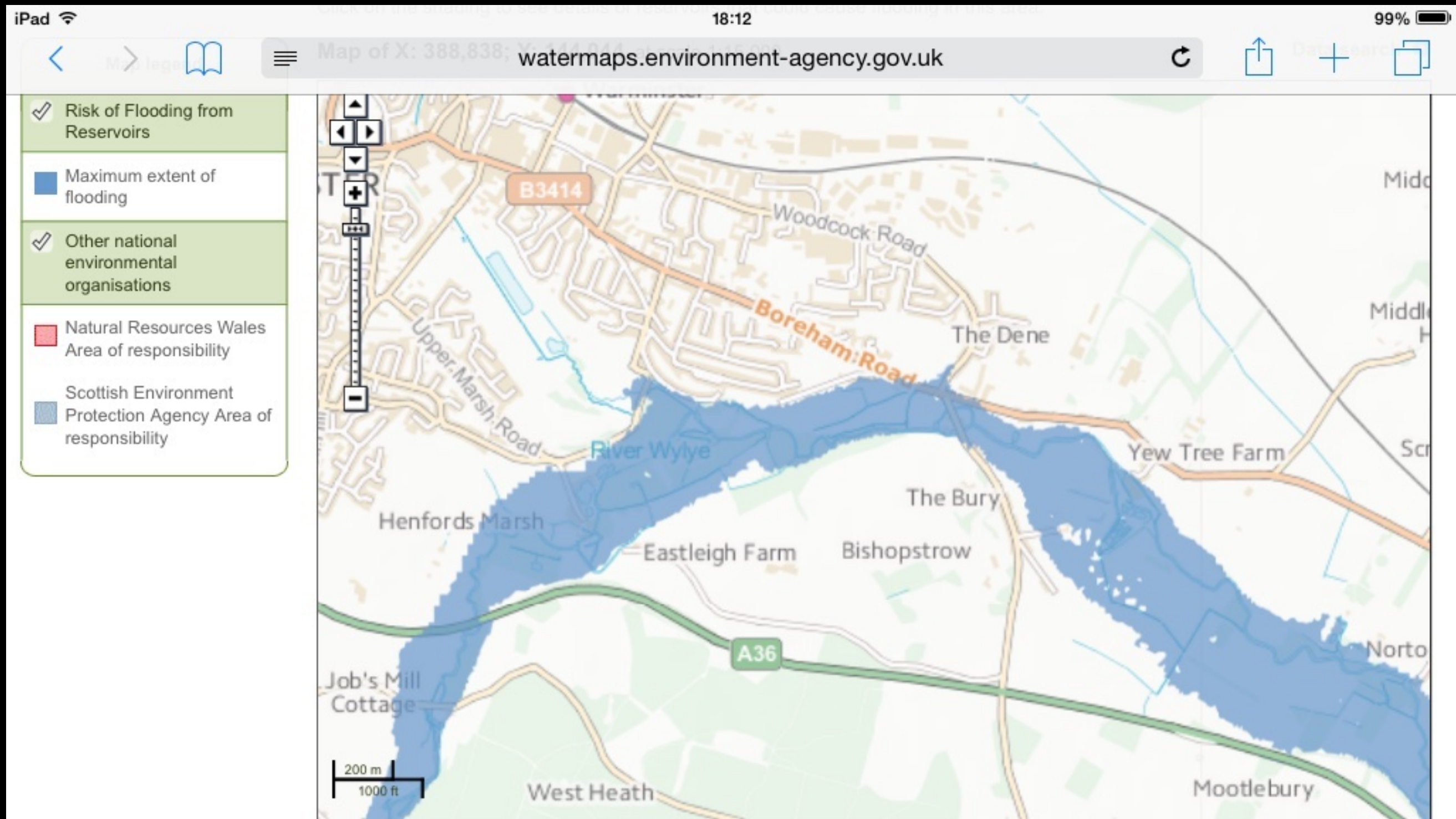
Warminster flood Plan map shows areas effected by repeated flooding. These correspond to the river course and geological origins of moving water, Home farm is currently a water holding area with no direct drainage connection to Boreham rd or the floodplain. Both areas suffer extreme flooding which will not be helped by adding more water to an already overburdened system. It is clear by the regular flooding on the road that drainage is already an issue.



These following EA maps show Warminster to be effected by all forms of flood water. Boreham rd and Bishopstrow are both inundated regularly as flood infrastructure fails to cope. The road and access point to the town and site is especially vulnerable being only just higher than the floodplain and limited ability to drain during floods.



This map shows the entire valley bottom and road inundated by reservoir flooding. This is the only area in Warminster with all these risk factors and no mitigation to manage any of them. Trying to add additional discharge points into this area will increase flood risk to others who already flood.



Basic view ☒ Detailed view

 Flood risk from rivers or the sea

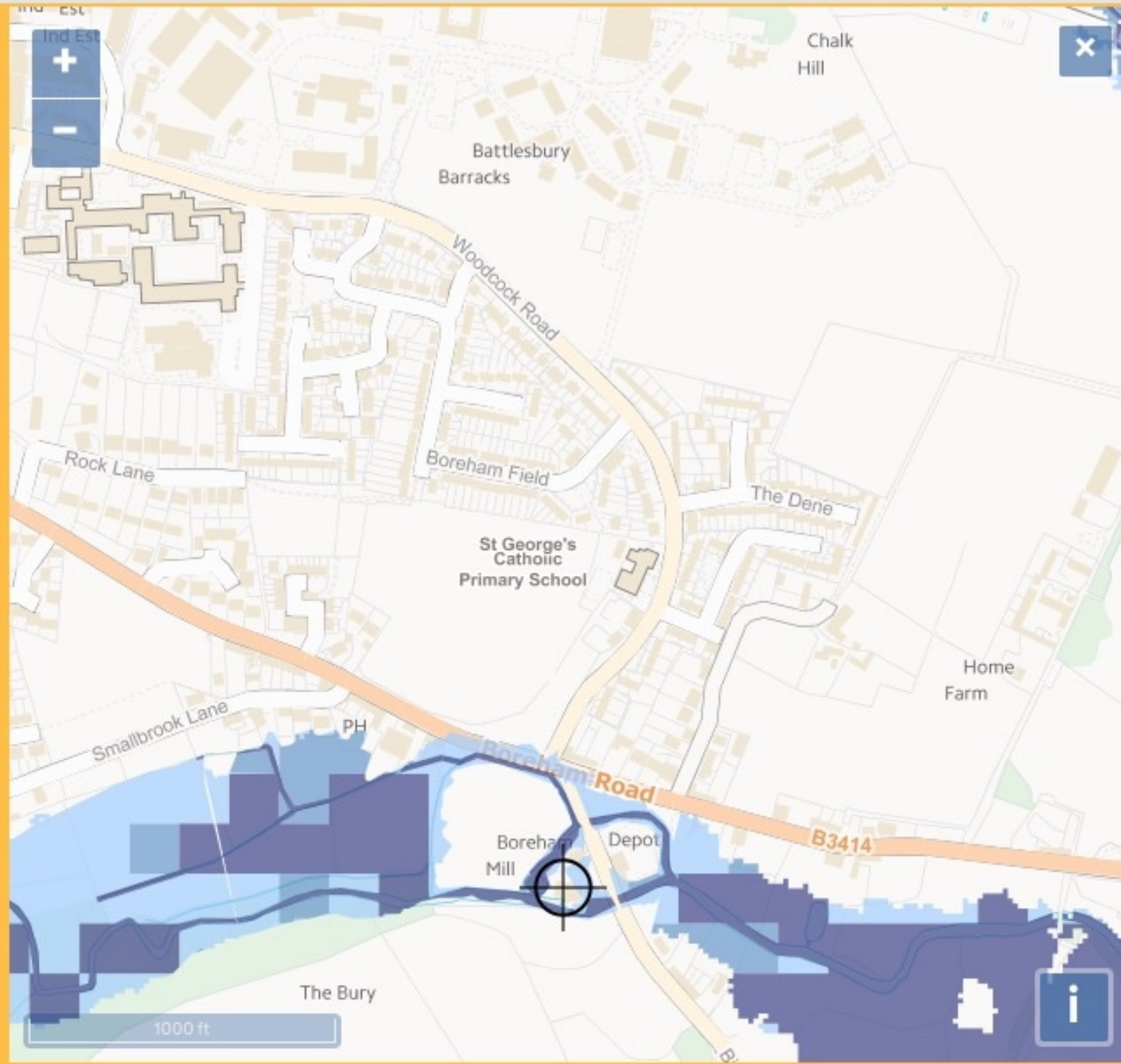
- ☒ Extent of flooding
- ☐ Depth and flow estimates at monitoring stations

 Flood risk from surface water

- ☐ Extent of flooding
- ☐ High risk: depth
- ☐ High risk: velocity
- ☐ Medium risk: depth
- ☐ Medium risk: velocity
- ☐ Low risk: depth
- ☐ Low risk: velocity

 Flood risk from reservoirs

- ☐ Extent of flooding



Flood risk

-  High
-  Medium
-  Low
-  Very low

 Location of the postcode you entered

Basic view ☒ Detailed view



Flood risk from rivers or the sea

☐ Extent of flooding

☐ Depth and flow estimates at monitoring stations



Flood risk from surface water

☒ Extent of flooding

☐ High risk: depth

☐ High risk: velocity

☐ Medium risk: depth

☐ Medium risk: velocity

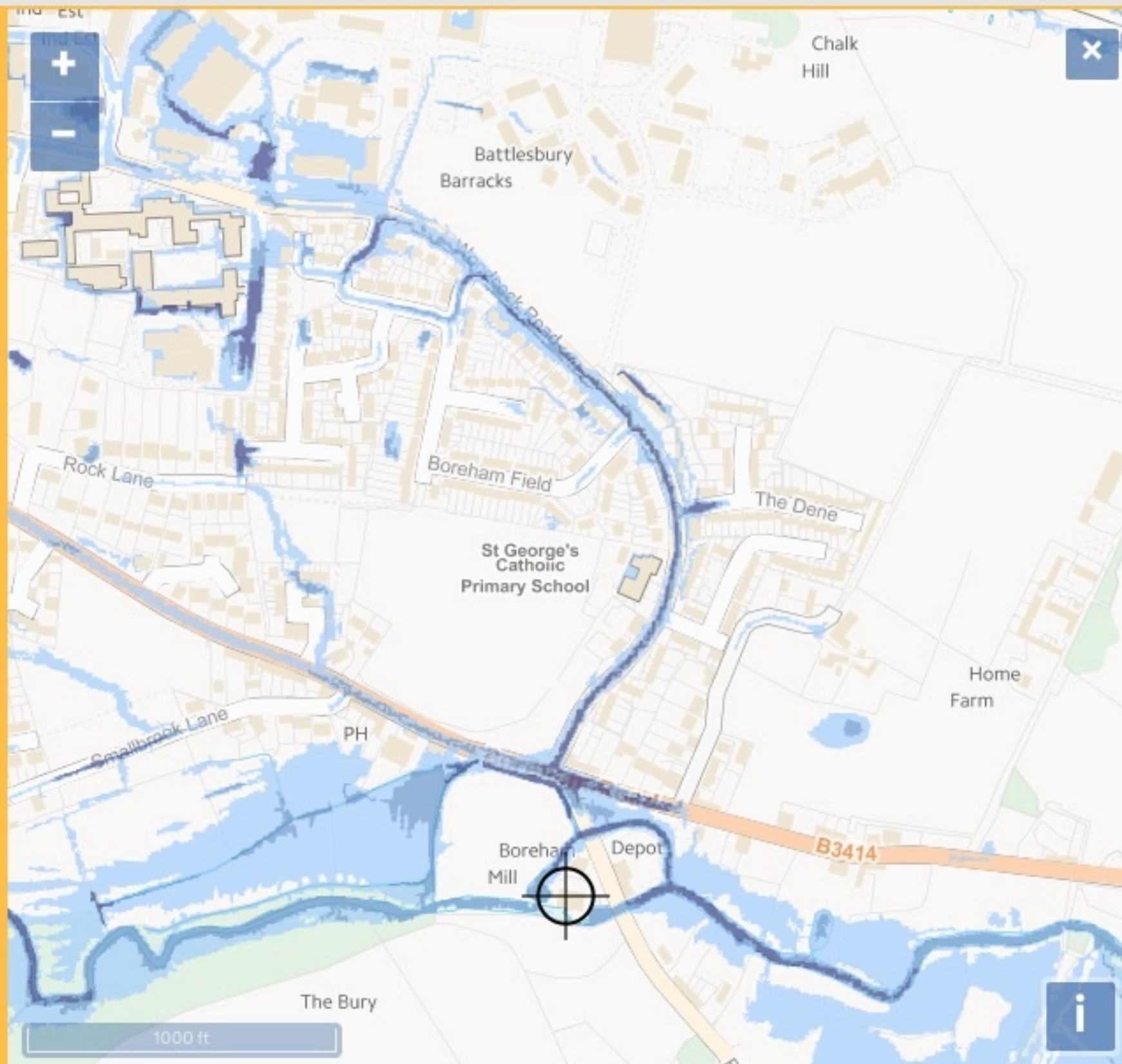
☐ Low risk: depth

☐ Low risk: velocity



Flood risk from reservoirs

☐ Extent of flooding



Flood risk



High



Medium



Low



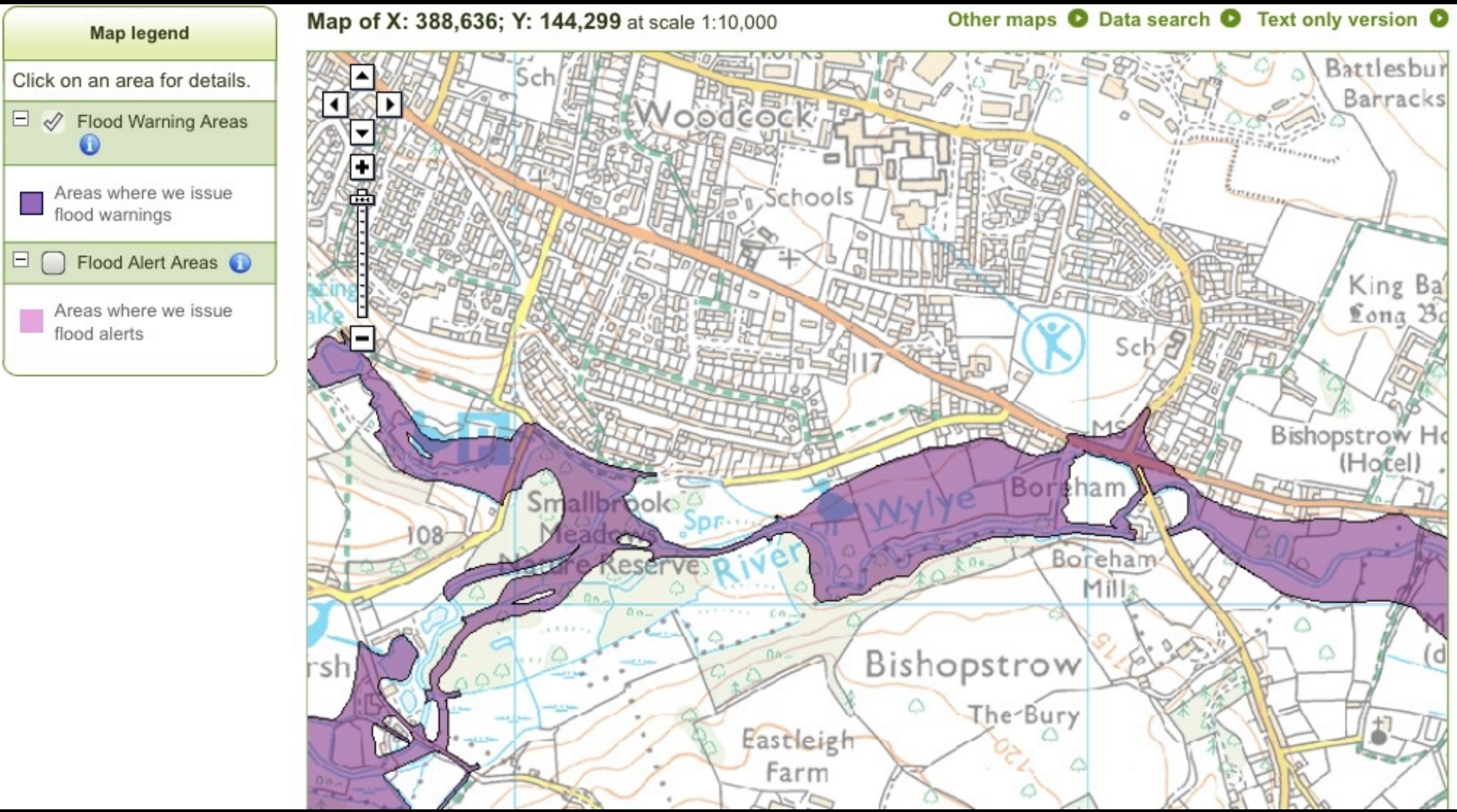
Very low



Location of the postcode you entered

FLOOD WARNING AREAS AROUND SITE.

The purple areas indicate sites at high risk of flooding and that residents in this area when contacted must act immediately to prevent flooding. Discharging into this area from a site previously not directly connected without assessing spare capacity at the discharge location will increase flooding in a high flood risk area making it harder to access the town or site.



In addition to planning control Wiltshire council is Lead Local Flood Authority with roles and responsibilities to manage flooding.

- Lead local flood authorities (LLFAs)
- LLFAs are county councils and unitary authorities. Under the FWMA, LLFAs are required to:
- prepare and maintain a strategy for local flood risk management in their areas, coordinating views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning.
- maintain a register of assets – these are physical features that have a significant effect on flooding in their area
- investigate significant local flooding incidents and publish the results of such investigations
- establish approval bodies for design, building and operation of Sustainable Drainage Systems (SuDS)
- issue consents for altering, removing or replacing certain structures or features on ordinary watercourses
- play a lead role in emergency planning and recovery after a flood event.

Wiltshire councils Local Flood Risk Management Strategy shows the council is aware of all the flood information sources it should be using and the policy requirements laid out in the NPPF with additional county specific processes in the SFRA to follow to understand and minimise flooding impact and extent.

Warminster is noted for further surface water flooding studies, due to the 1200 properties already at risk. Other high risk areas have been assessed already to ensure safe development.

Community	Number of Properties at risk
Salisbury	2100
Trowbridge	1600
Warminster	1200
Calne	1100
Melksham	790
Westbury	690
Chippenham	690
Pewsey	610
Aldbourn	600
Marlborough	570

5. Managing local flood risk

Wiltshire Council's Local Flood Risk Strategy will seek to

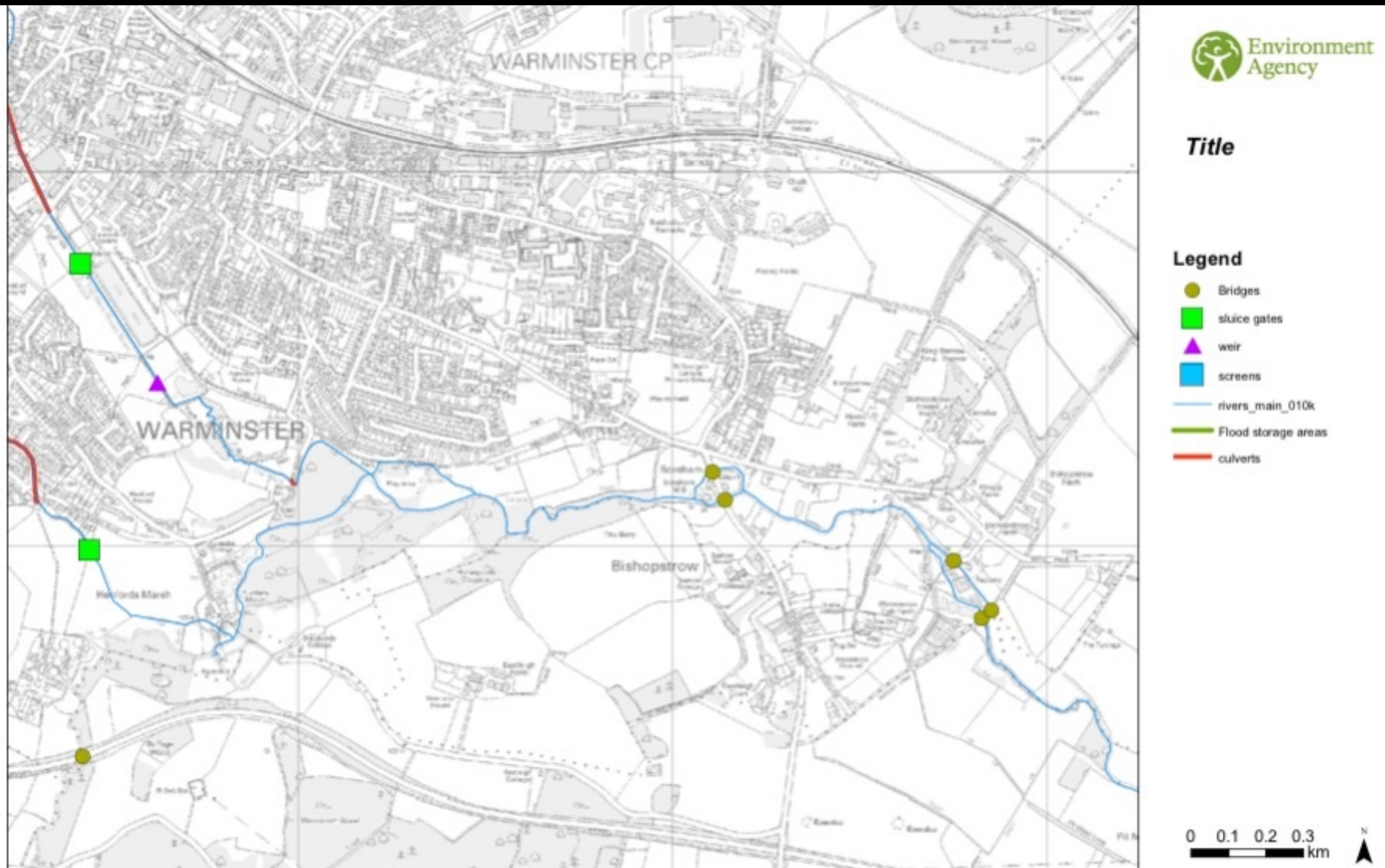
- Improve knowledge regarding flood risk
- Improve protection from flooding
- Improve resilience to flooding
- Improve the environment
- Improve communications about flooding issues

Improving Knowledge

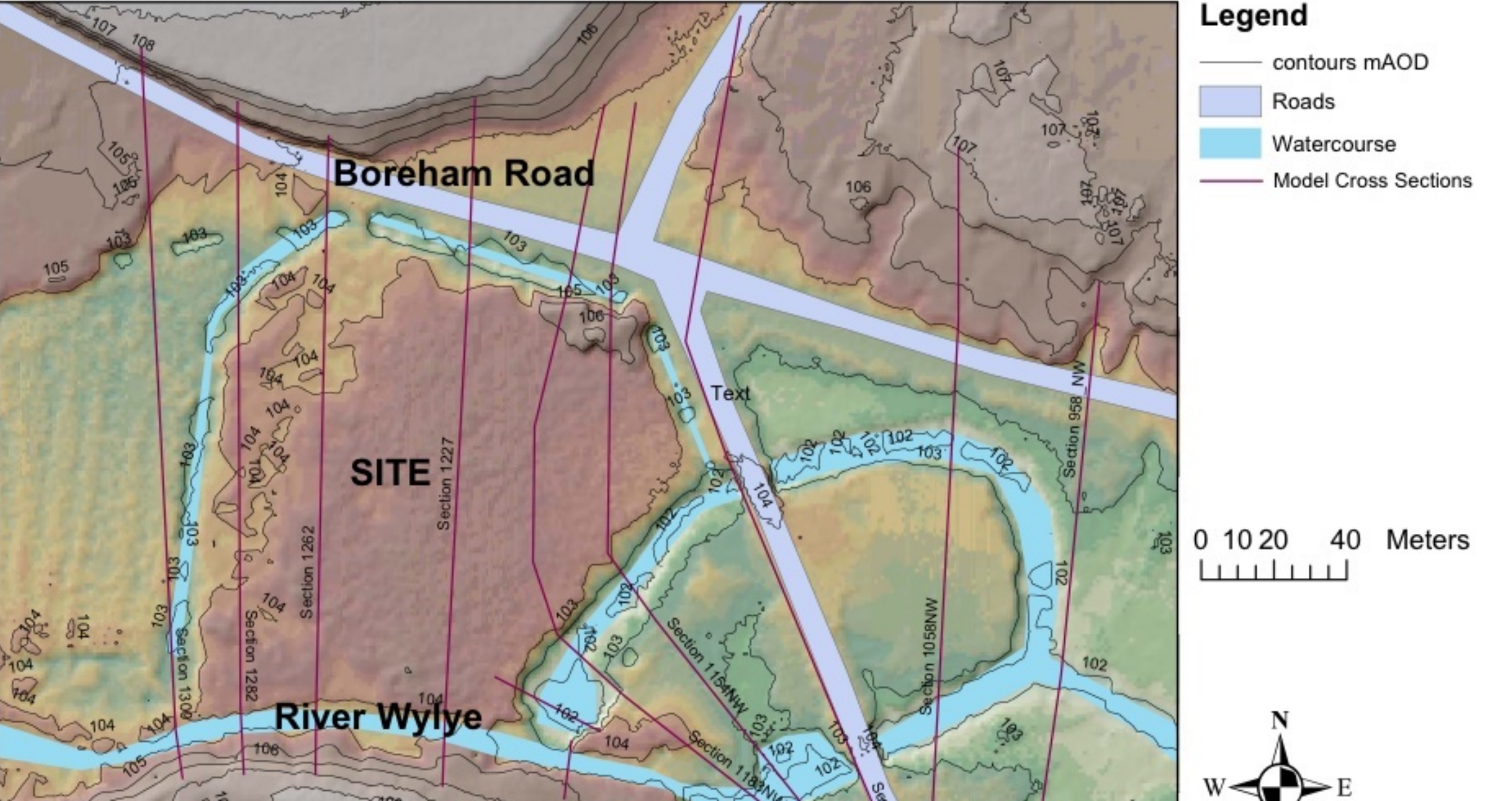
In order to understand the county's flood risk better a number of studies have been completed or will be undertaken.

Study	Description
Preliminary Flood Risk Assessment (PFRA)	This document provides a summary of historic and predicted flood risk across Wiltshire and was completed in 2011. No areas of significant flood risk in accordance with the legislation were identified. This assessment will be updated every 6 years.
Strategic Flood Risk Assessment (SFRA)	The National Planning Policy Framework requires that local planning authorities address the risk of flooding by directing development away from areas at risk of flooding. In order to achieve this aim, local planning authorities are advised to prepare and maintain a Strategic Flood Risk Assessment (SFRA) utilising data provided by the Environment Agency. The SFRA is used as a tool for the purposes of preparing local plans and assisting with the process of determining planning applications. In terms of content, the SFRA presents a series of maps detailing the areal extent of critical flood risk zones associated with main watercourses across Wiltshire. In addition, it provides practical policy advice on the application of the 'sequential' and 'exception' tests.
EA updated Map for Surface Water Flooding	The map for surface water provides information on areas within Wiltshire susceptible to surface water flooding.
Surface Water Management Plans	SWMPs have been prepared by Wiltshire Council for Trowbridge, Chippenham and Salisbury. Further studies are being actively considered for Warminster, Malmesbury, Melksham and Bradford on Avon. Further studies will be undertaken as resources permit.
Local Catchment studies	Studies are currently being carried out by Wiltshire Council regarding flood risk in the local communities affected by the 2013/14 flooding, including Tilshead, Chilmark, Chitterne and others. A study in Castle Combe is being undertaken by the EA with assistance from Wiltshire Council. Consideration will be given to further local studies in response to particular events.
Other Studies	Site specific studies will be undertaken at locations of particular risk of flooding as identified by the Council's Operational Flood Working Groups. These will often involve partner organisations.

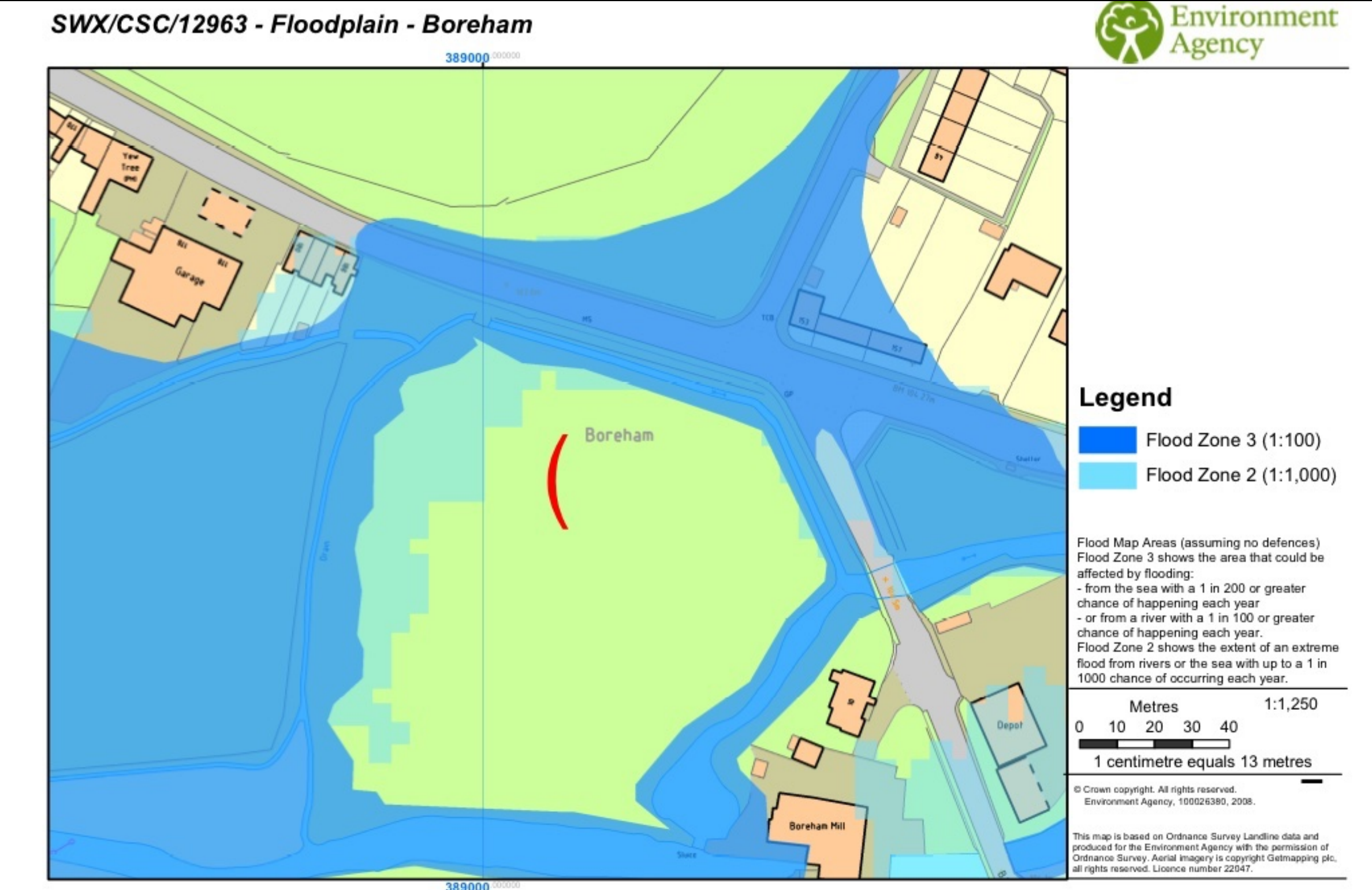
The Council as LLFA is required to map all flood risk assets and effecting features, the key for this map indicates a few of the features they usually show. Despite 2 weirs, a sluice gate, a culvert and a 3 hectare embankment being present at Spurt Mead which used to be floodplain, none are marked on the EA map, the council did not have a map and as such the impact on the flooding regime in the area is unknown.



The site(Spurt Mead) has created a meter high barrier to water moving down the floodplain from the town. Forcing water around the site via the road and highways ditch.The council has not registered this site as a flood risk asset despite its huge effect on water movement. Flooding in the area is regular and extreme yet considering the council use the ditch to discharge all surface water leaving town, and highways, no assessment has been done. This causes lots of flooding to the roads and surrounding properties shown in the next EA flood extent map.



Flooding on Boreham rd caused by the river alone is extensive. When this flooding occurs the council's surface water drainage ditches are inundated pouring water onto the road, leaving no room for additional surface water discharge. No solution for this issue is indicated yet new drainage from home farm to both the sewage pumping station and storm drainage system is planned. Due to the loss of floodplain storage capacity this issue cannot be fixed by limiting flow.



EA advice by Andy Hicklin for the Spurt mead, and the surrounding area including Boreham rd and Bishopstrow.

" I should be clear that were such a proposal (land-filling in a floodplain) to come forward today, we are highly likely to object to it because of the reduction in flood plain storage and conveyance. At the very least, we would be looking for compensatory storage to be provided. This is because it would almost certainly increase flood risk elsewhere."

Flooding in the area is a real issue and that anything that can be done to reduce it would be a good thing.

Raising of land in 1963 undoubtedly contributes to the problem.

The raised land is now above flood level and does not flood. The surrounding area (roads etc) does flood.

A strategic solution to flood risk throughout Warminster would be the best way forward for the town and Boreham. This would need to consider flood risk from all sources and in all parts of the catchment."



Wiltshire councils role in causing flooding.

- Wiltshire council is using a drainage system that was designed and built for another era. This system has been adjusted hundreds of times as new developments connect to it yet no assessment of the system as a whole has been done to understand capacity and the impacts when capacity is exceeded or when the discharge location is full, when the river is in flood, as the original floodplain area used as the discharge location has been removed changing storage capacity from a 3 acre field to a 2 meter wide ditch used for river flooding overflow.
- The EA have stated this part of the valley suffers due to lost flood storage causing flooding to the road and surrounding properties and a solution for this needs to be found.
- The discharge point for most surface water is in the river, via various pipes and ditches. Some enters via the road drainage or directly from fields, but does the river have enough spare capacity for the new houses and climate change? as old houses have no suds to limit flow.
- Development in the floodplain has been done repeatedly, drastically reducing its capacity, yet only relying on the limited rate of flow from new developments to reduce flooding. As development increases taking more floodplain and fields previously used as soakaways or water holding areas, the flooding increases. At what point this becomes negligence I don't know, but to claim that development will not effect flooding without having proof this is the case is. To deliberately place people at unnecessary risk by using inaccurate information, in a known high risk area, is dangerous, and it shows intent to deliberately place people in danger both on and off site.

The developers incorrect assumptions on surface water

- To be able to understand how flooding occurs, an actual study of the site and river should be done to understand flow and capacity rates, not a desk top survey of available information.
- The details in the SFRA are not for individual sites but for the county to allocate funds to areas at higher risk to do more assessments. Warminster is one of these areas. It is also effected by both river and surface water flooding so using an assessment based on river flooding ie zones, is only half the picture. No information of flooding in this field has been logged by the EA or council as it is just a field, so expecting flood information to be available is ridiculous, unless you ask local residents who can tell you where it floods and why. Local knowledge does not match the FRA produced which makes incorrect assumptions of how water moves across the site, claiming it goes up hill and out via the gate, this does not happen.
- The SFRA says the best Available information currently available is the EA FMfSw map. This cannot be used to assess flood risk as it is not detailed enough as confirmed in the site FRA report.
- Warminster is advised to do more assessment of flooding, especially surface water flooding, as the information available is not sufficient to use for this, so why is insufficient information all that is used?
- The FRA claims water already flows onto Boreham rd at the single gate entrance location, yet no one who lives here has ever seen this happen, as the flow of water is not to this location. Most water is pushed towards the lowest point at home farm entrance, which is why, I assume, this is where the holding pond will be. To create more water discharge to Boreham roundabout when there never was previous discharge to this location,(this would also explain why they are pumping the water out to the road), in the knowledge the entire road floods significantly, is to deliberately cause flooding to others, which is unacceptable in all planning policy, and government fiscal responsibility, as damage to the road and drainage system is inevitable along with any emergency services forced to use the main access route to this area.

Flood risk
assessment
map with
arrows
showing
water route.

The FRA map indicates all water naturally moves from top left to bottom right of the map discharging where the new storage area is planned. Only a tiny area is currently capable of discharging at the gate location, highlighted by the new blue line leaving the site. Why the FRA assumes most flood water already uses the gate is unfathomable, as they indicate on their own map the natural flow due to topography, and the need to then pump water from the new storage location indicated to the gate exit on Boreham rd. The assumptions used in the FRA do not match reality.



Developers incorrect assumptions on sewage discharge capacity.

- The assumption is that sewage can be dealt with by the pumping station, yet for many years this has been flooding the main road in raw sewage due to insufficient capacity. There is no room or ability to store sewage at the pumping station, as it floods due to the river, so a much bigger capacity pump is required, yet as the current one gets blocked, this one will too, and as discharge rates rise due to climate change, due to this being a combined system the problems only increase.
- The comment that there are no issues in the sewage network is wrong, clearly highlighted in the next photos indicating regular overflows from the same locations, just prior to reaching the pumping station, Boreham rd, up Woodcock rd to the school, so significant.
- All sewage flooding goes directly into the river Avon SAC which is supposed to be protected, but as all recent studies have shown is severely impacted by phosphates and nitrates(being rated as poor). We cannot keep polluting this river and expect it to survive which has been pointed out repeatedly, so until a safe and effective sewage system has been devised to prevent the current frequent raw sewage discharge to the river, no additional houses and associated pressure should be added to an already flawed system.
- Reservoir flooding although outside the site will remove all water and sewage discharge ability having a huge impact, as well as closing the road, preventing access,etc.



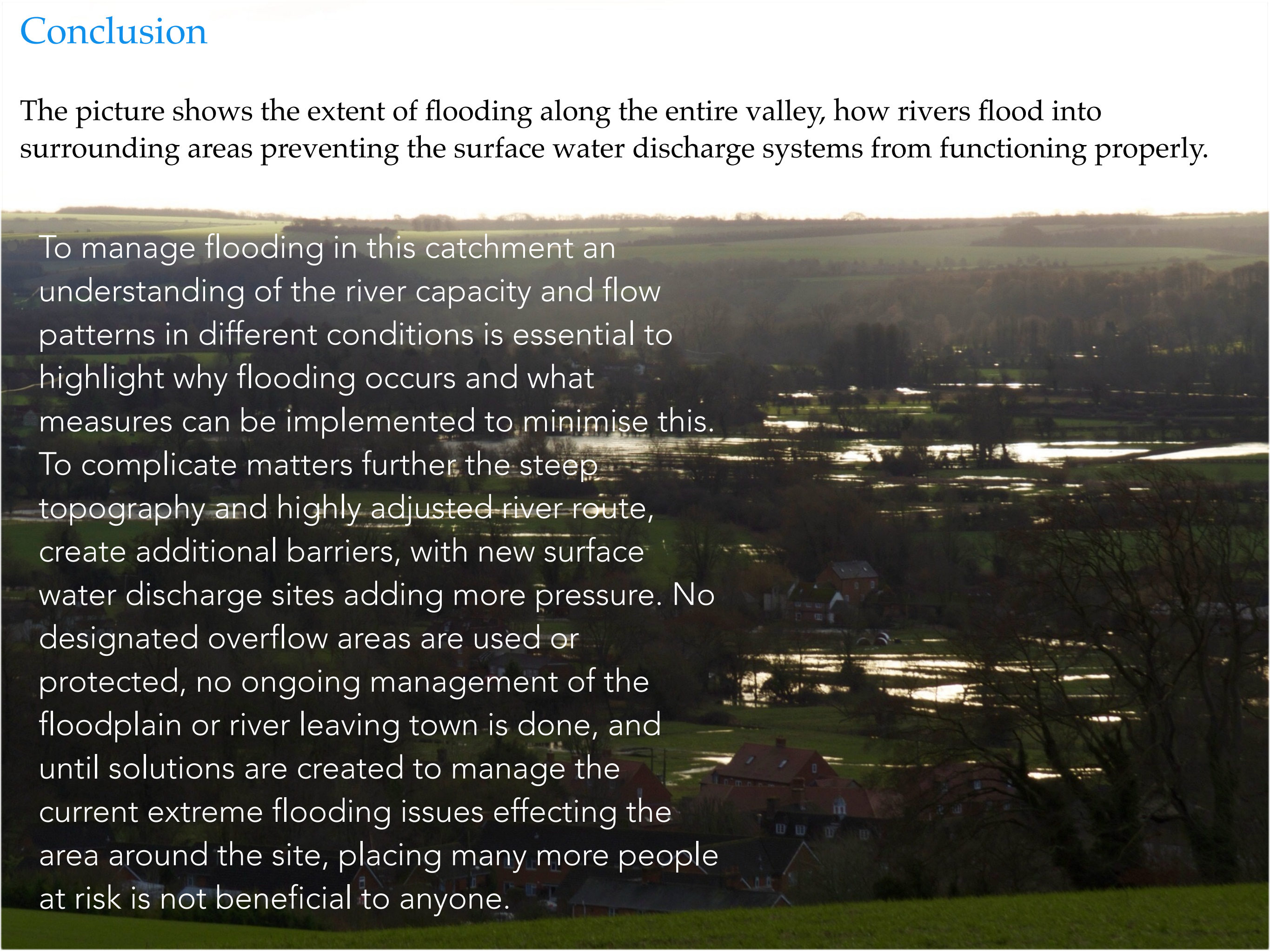
Conclusion

- The council has agreed to follow government advice, their SFRA flood management guidance, and to do the sequential test to ensure flood risk is not increased by new developments.
- The NPPF shows clearly how this should be done and states that if not done adequately development must be refused. The SFRA adds more detailed instructions on applying the sequential test locally.
- In order for the Core Strategy to pass, the advice by the EA to do a SFRA 2 for all Warminster was agreed, to ensure development is sustainable, which was highlighted as important by the planning inspector. He stated that the WUE can proceed without this assessment due to the area being less flood effected but all other development must show how they have dealt with this issue. (this advice has not been followed)
- The issue is both river capacity, and surface water amount combining to limit water discharge from the valley, causing floods at all pinch points along the valley floor. The flood zones cannot be used solely in applying the sequential test, and because the FRA for the site relied solely on surface water flood data provided by the EA, with insufficient detail for developments, knowing the EA had advised more assessments where needed to understand surface water flooding and drainage infrastructure across the area, as current information is insufficiently detailed, the developer FRA assessment is not adequate.
- To use substandard flood information in the knowledge that each authority states clearly, proper town wide flood infrastructure assessments are required, and a surface water management plan should be done, as surface water flooding is known to be an issue in this area, combined with the river flooding issue at the location chosen for the discharge sites. How you safely discharge water into a flooding river when the pipes are underwater has never been adequately explained, or what control or management the council has over surface water flooding here or at other locations which is why flooding continues to get worse.

Conclusion

The picture shows the extent of flooding along the entire valley, how rivers flood into surrounding areas preventing the surface water discharge systems from functioning properly.

To manage flooding in this catchment an understanding of the river capacity and flow patterns in different conditions is essential to highlight why flooding occurs and what measures can be implemented to minimise this. To complicate matters further the steep topography and highly adjusted river route, create additional barriers, with new surface water discharge sites adding more pressure. No designated overflow areas are used or protected, no ongoing management of the floodplain or river leaving town is done, and until solutions are created to manage the current extreme flooding issues effecting the area around the site, placing many more people at risk is not beneficial to anyone.



Conclusion

- To be unable to state the spare capacity currently available in the river system, and what happens to surface water when the river floods into surrounding areas, blocking the drainage system, shows a complete disregard for the impact this development will have on the current community.
- It is impossible to say no issues are present in the area, or that they are under control, and that there is a plan on how to cope with the additional water created by the huge development across the town in other flood effected areas and floodplain, or any method for managing climate change as suds are only effective to a limited amount where they are used. This shows that this is not a sustainable development and must be refused.





Flooding across Boreham rd

Down to Grange lane with sewage
recharging into the road again,
November 2016.





I OBJECT TO THIS APPLICATION TO DEVELOP HOME FARM

As the entrance to home farm shows in November 2016 there is no evidence that the developer or council has sufficient understanding or control of the current flooding issues being endured by the local community to allow additional development in such a high risk area.

This flooding in this location is frequent and unavoidable due to the height of the road compared to the floodplain. It shows access to the site can be removed in significant floods and access by foot is dangerous.