

OBJECTION: Material Non Disclosure of Engineering Footprint inside SSS1 Buffer

Email To: Becky Jones, Case Officer 27.09.26

Further to my previous submission regarding the material inaccuracies within the Viability Report, I am writing to formally alert you to a critical, undisclosed engineering element within the Red Line Boundary on the Block Plan that completely invalidates the current statutory consultee responses.

On the submitted Block Plan, the applicant has included a small text note stating:

'2 new parking spaces created off the road onto land built up from the bank to create level pull in off roadway, land graded back from edges down to existing river bank.'

Scaling this plan, the distance from the road boundary to the River Avon bank is approximately 12 metres. The proposed 3-metre lay-by and the physical act of 'building up' and 'grading back' sits entirely within the **Environment Agency's statutory 8-metre Main River exclusion zone**.

The 'No Objection' responses currently on file from the Environment Agency and Highways were clearly issued against a generic desk-study of the static forge building. They have completely missed this note. It is physically and structurally impossible to build a level 3-metre vehicle platform on this sloping bank without substantial retaining structures, structural infill, and extensive bank clearance. Furthermore, the Applicant has failed to specify the surfacing material for the lay-by. The Council lacks the required data to assess whether the surface will be an impermeable material causing toxic runoff from cars, or a loose material causing structural erosion and siltation directly into the River Avon SSS1/SAC. None of which are evaluated by civil engineering cross-sections, geotechnical stability data, or site-specific ecological assessments.

Because the specialist environmental reports strictly limited their scope to the building 'in general' and completely omitted this active riverbank engineering footprint, the application suffers from a fatal data deficit. I request that the application be paused until the applicant provides full topographical cross-sections and a formal Environment Agency Flood Risk Activity Permit (FRAP) assessment for proper public consultation.