

Eardisland Parish Council wishes to object to the amended plans and documents submitted for P152779/F, Land adjoining Orchard Farm, Eardisland – Proposed construction of 5 no dwellings with garages. Formation of new access and private drive and close existing. Demolition of outbuilding, steel framed barn, wind tunnel and greenhouse.

Please note the following points:

1. The amended Flood Risk Assessment (FRA) dated February 2016 is noted
2. This report states at 2a that the only significant flood risk is from fluvial flooding. This is inaccurate. In heavy rainfall, water flows off the fields to the west of the site without any fluvial flooding and flows through the site leading to standing water on the lower part of the site as shown below

Pictures 1, 2 and 3 showing the lower part of site close to new position of proposed plots 1 and 3. These photos were taken when much of the standing surface water was receding



3. The amended FRA states that land at 2 points on the southern part of the site will be lowered to provide floodplain storage as compensation for specifically plots 1 and 3
4. Although the amended plans have moved the site for plots 1 and 3 just out of the Flood Zone 2/3 area of the application site, the 2 points for floodplain storage are in Flood Zone 2/3 and if the water table is as high as usual when there is heavy rain in Eardisland (see 15 below), it is likely that such floodplain storage will be overwhelmed
5. This floodplain storage takes no account of water coming off the fields onto the site in heavy rain. Therefore there is still a significant risk of flooding to the proposed new properties and to neighbouring properties when the proposed floodplain storage is overwhelmed
6. The suggested raising of height by a minimum of 450mm is likely to impinge on the neighbouring properties. Roof heights of proposed properties need to be adjusted to be in relationship to surrounding properties
7. Any application must meet all the criteria in Eardisland NDP policy E1 and this application is currently not in conformity with at least E1 (e), (j), (n), (p) and (s)

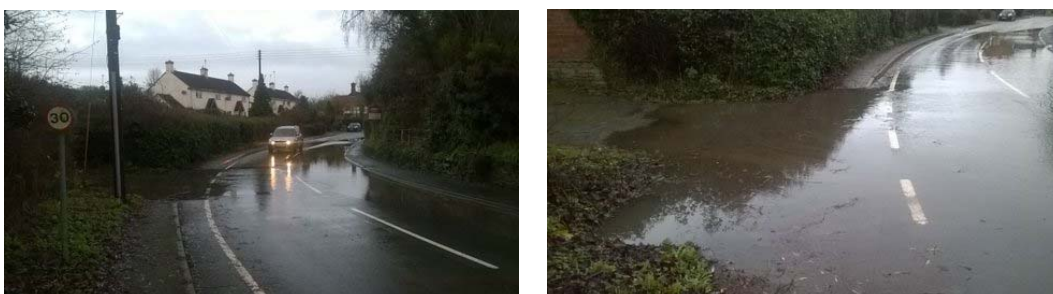
8. The evacuation route suggests taking residents down Burton Lane past The Brouch. This is not an achievable pedestrian evacuation route, as in flood events it would take pedestrians through the deepest area of flooding by the entrance to School Lane – see 9 below
9. Although the Environment Agency warning system for Eardisland village means that the 2-hour warning window is likely to be compromised if other communications are affected, as noted on 8 March by a resident whose mobile signal was disrupted leading to receipt of a warning considerably more than 2 hours later
10. This leads to a risk of prospective residents leaving their properties and going onto the road which has been known to reach 600mm in depth of floodwater, with a strong current going from the main road into School Lane and possibly with floodwater on the road stretching from the village side of Orchard Farm continuously past the turning for Burton Lane, as shown in pictures 4 and 5 below

Picture 4 is looking from the village past Green Elms towards Orchard Farm entrance. Picture 5 is looking towards the Burton Lane turn



11. It is noted that the Highway Safety Assessment report is based on a site visit in fine and dry conditions. The photo at 1.4 contrasts greatly with the situation after rainfall as below

Picture 6 clearly shows a car coming from the village on the wrong side of the road to avoid standing water on the road. Picture 7 shows standing water coming from the current Orchard Farm entrance leading to flooding across the road in rainfall



12. The Highway Safety Assessment does not address the issue of turning right coming from the village into the proposed site with much reduced sight lines
13. The optimum speed of 25 mph to negotiate the bend in the road to the south of the proposed site entrance is noted by residents with daily experience of this road
14. Therefore the dry and wet 85th percentile speeds noted in 3.2 of the Highway Safety Assessment show speeds that may be within the 30 mph speed limit but are higher than the optimum speed considered safe by residents

15. It is known that the high water table in rainfall prevents drainage in many parts of the village, leading to water surging upwards out of drains onto the road rather than the drains taking water away off the road
16. Neither the amended FRA nor the Highway Safety Report consider work that will be needed to address the water flooding and land drainage at the point of the proposed new access, so that the situation in rainfall is not worsened from the currently observed situation
17. The ditch along the field line on the western edge of the site continues south past The Bramleys and then is blocked. It does not have an outflow into Southalls Brook
18. Given the known levels of water on the road and in the ditches and Southalls Brook in rainfall, the channelling of 'any surcharged flow away from the dwellings, in the event of failure' of the proposed surface water management system for the application site (as stated in 8a of the FRA) will lead to an unacceptable increased risk of flooding to neighbouring properties
19. In addition the discharge from the planned new treatment plant will be entering a ditch with no outlet, leading to further increased flooding risk to both prospective and neighbouring properties
20. Section 2a of the amended FRA states that there are no sewers on the site. However the sewage plant for Green Elms is adjacent to the site and the pipe from Green Elms to the sewage plant crosses the site
21. The sewage plant discharges into the ditch mentioned in 16 and 18 above and currently appears to be discharging sewage rather than cleaned water into the ditch, with a subsequent offensive foul smell pervading the prospective site and surrounding areas
22. The danger of noxious smells from the sewage plant was pointed out to the applicant at the site visit with Parish Councillors on 12 November 2015
23. The impact on 2 listed buildings located opposite the proposed site entrance (Ruscote and The Latchetts) and on the Eardisland Conservation Area has not been addressed by any heritage impact assessment
24. Therefore this application does not conform to the National Planning Policy Framework, paras 128-129
25. Whilst it is recognised that only limited weight can be given to the Eardisland NDP as it is not yet submitted under Regulation 16, the application is not in conformity with either the National Planning Policy Framework or Herefordshire Council's Core Strategy and is therefore unsustainable development.