

Village Housing Options Response Form 2013

For Official Use Only

Ref:

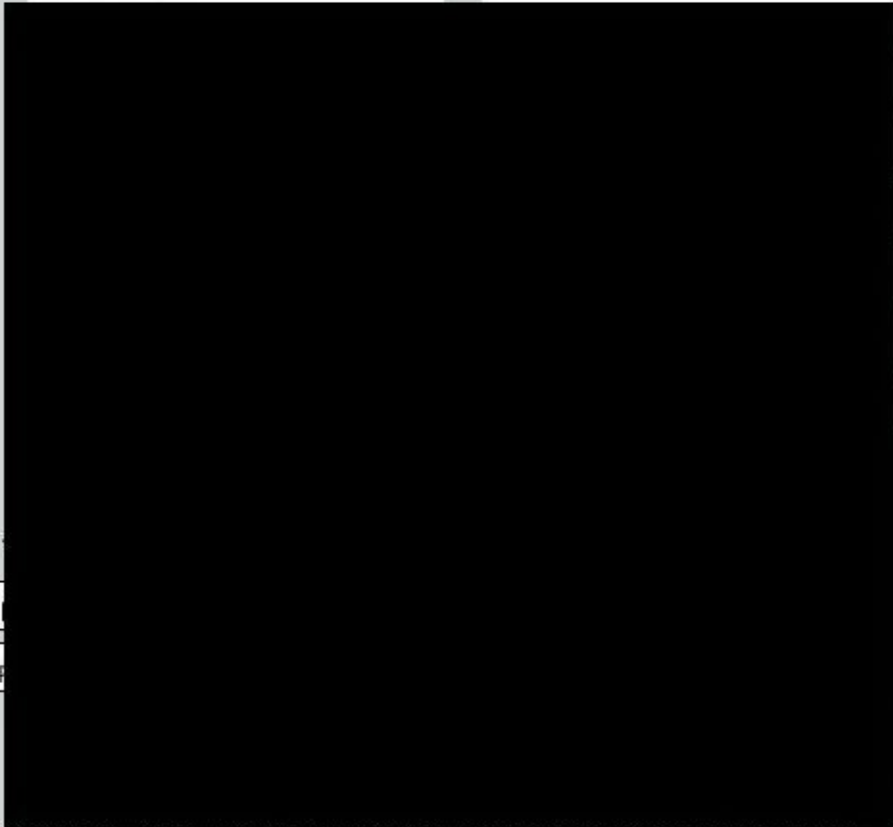
Rep. Ref.

Please use this form if you wish to support or object to the Village Housing Options and Settlement Boundaries.

If you are commenting on multiple sections of the document you will need to complete a separate copy of either Part B and/or Part C of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices where the plan has been made available (see back page). You can also respond online using the LDF or places Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Iredale	
Job Title (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
Would you like to be made aware of		
About You: Gender		
Ethnic Origin	<input type="checkbox"/>	
Age		
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, parish council?	Word of mouth	

Part B - Commenting on the Village Housing Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Page (56) Chapter Paragraph
 Table or Figure (12) Village Plan (12)

What is the nature of your representation?

Support

Object

Please set out full details of your representation of support or objection. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

I would like to object to the allocation of **Site 1** as the preferred option for housing, based on the following key points.

1. Heritage and setting.
2. Visual Amenity.
3. Flooding
4. Ecology
5. Highways
6. Archeology
7. Access to amenities
8. 1994 inspectors planning report
9. Land quality and the 1984 application to build on site 1.

Please refer to the attached detailed statement with supporting evidence.

Site 2. Offers the most logical position to provide an extension to the village being on the South side of the Southam Road, connected to the existing boundary. It has good vehicle and pedestrian access.

Site 2 should therefore be the preferred option, **not site 1.**

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Part C - Commenting on the Indicative Settlement Boundaries

If you are commenting on multiple sections of the document, you will need to complete a separate sheet for each representation

Sheet of

Which settlement are you responding to?

Radford Semele

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (use a separate sheet if necessary).

The settlement boundary for Radford Semele should be amended to exclude **Site 1(preferred option)** and to **include Site 2** as the preferred option for housing.

Please refer to the attached detailed statement with supporting evidence.

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Rep. Ref.

Guidance on Making Representations

- Please use this response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/newlocalplan
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of either Part B and/or Part C of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing
- All forms should be received by **Monday 20 January 2014**.
- Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998
- To return this form, please drop off at one of the locations below, or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Location
Warwick District Council Offices Riverside House, Milverton Hill, Royal Leamington Spa
Leamington Town Hall Parade, Royal Leamington Spa
Warwickshire Direct Whitnash Whitnash Library, Franklin Road, Whitnash
Leamington Spa Library The Pump Rooms, Parade, Royal Leamington Spa
Warwickshire Direct Warwick Shire Hall, Market Square, Warwick
Warwickshire Direct Kenilworth Kenilworth Library, Smalley Place, Kenilworth
Warwickshire Direct Lillington Lillington Library, Valley Road, Royal Leamington Spa
Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
Finham Community Library Finham Green Rd, Finham, Coventry, CV3 6EP

You may also find information at venues in your local village or by contacting your local Parish Council.



Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

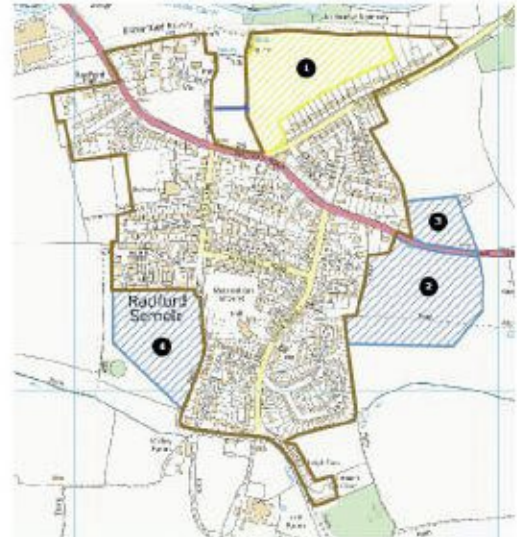
Comments by Richard Iredale on Warwick District Council (WDC) November 2013 Local Plan for the Village of Radford Semele

Key Objections to Site 1 being considered as the preferred option for development.

Site 1 – WDC Preferred Location

Sites 2 & 3 – Discounted on basis of “High landscape impact and insufficient vehicle access”

Site 4 – Discounted on basis of “Impact on main village centre and potential to encourage coalescence of settlements”



1. Heritage and setting

Site 1 field adjoins St Nicholas Grade II Listed Church which is listed on the English Heritage web site. This confirms that Grade II listed buildings are nationally important and of special interest. The field and the Church are also viewed from The White Lion pub which is itself a Grade II listed building.

Planning Policy Statement 5 (PPS 5) makes it clear that the setting of a heritage asset must be protected and that **alternative locations** must be considered if harm would be done to heritage asset by site development.

English Heritage publishes guidance which confirms that any development that will be harmful to the view, character and setting of a Listed Building is unacceptable. This principle is brought forward into national planning policy in the **National Planning Policy Framework (NPPF)**. **Paragraph 132 of the NPPF** gives clear guidance on how development that affects a Listed Building should be dealt with.

The English Heritage policy document “**The Setting of Heritage Assets 2012**” defines a setting as “*the surroundings in which [the asset] is experienced.*”

“From the definition provided above, it can be understood that setting embraces all of the surroundings (land, sea, structures, features and skyline) from which the heritage asset can be experienced or that can be experienced from or with the asset. Setting does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset.” English Heritage “**Conservation Principles Policies And Guidance**” document paragraph 15 states: that –

“Changes which would harm the heritage values of a significant place should be unacceptable unless:

- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;*
- b. there is no reasonably practicable alternative means of doing so without harm;*
- c. that harm has been reduced to the minimum consistent with achieving the objective;*
- d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place,*

These conditions are not met in Site 1.

Site 1 has a high heritage value as it provides the essential setting for St Nicholas Church and The White Lion Pub. **This site should not be proposed for housing and should be excluded from the SHLAA**

2. Visual Amenity

The development of Site 1 will significantly harm and damage the setting for these listed buildings. The views from Southam Road to the church and surrounding field and wooded backdrop will be significantly affected. This highest value of the viewpoint of the church is from passing traffic. The recent Highways Agency report has calculated that in 2012 the daily traffic flow past this viewpoint of the church is **15,000 vehicles per day**. In an average week there are potentially **75,000** opportunities of viewing this site. See picture below from Southam Road. To develop Site 1, will remove this view of the setting of the church to a large number of people both within the village and in the wider community.



The setting of the Church is also able to be seen by the residents of Offchurch Lane from the rear of the properties – **see two pictures below**. One is taken of the church from the rear of Offchurch Lane properties, the second is of the setting of the church. The church and its setting can also be viewed from the Grand Union Canal., public areas on Newbold Common and from as far away as Cubbington. The site is also particularly visible to all the people of Radford who travel down Church Lane towards the



Southam Road.



Views of **Site 1** from, 1. Southam Road, 2 and 3. Offchurch Lane, 3. Newbold Common.

Site 1 has a high heritage value as it provides the essential setting for St Nicholas Church and The White Lion Pub. **This site should not be proposed for housing and should be excluded from the SHLAA.**

3. Flooding

My **qualifications and experience**, to object on this subject. I am a professional hydrologist and have worked with the Environment Agency and its predecessors for the last 36 years. My current role is a National Technical Advisor. I act as the Technical Lead for the Environment Agency on surface water flow measurement. I have been a committee member of the BSI and International Standards Committee CPI/113 for flow measurement for the last 10 years. I have been a Flood Forecaster for the River Severn basin including the River Leam catchment for 20 years up until 2013.

Site 1. **Surface water flooding**. See Environment Agency Flood Risk map and detailed map attached in Appendix 1. The maps show details of high risk and medium risk of flooding on areas of Site 1. Two main areas of flooding are identified. 1. The run off from the center of the village to the south of Southam Road. This runs down School Lane and from Southam Road east and west where it combines and runs down Church Lane and across into the field (i.e Site 1) down towards the pumping station. Any development will have to avoid this area of flood risk. The second area of flooding is from water running down the hill from the south east towards Offchurch Lane and into Site 1 via the access opening into the field between house numbers 36 and 38 along Offchurch Lane. These two lines of flow reflect the natural

topography of the land in this vicinity. Prior to the canal and railway being built would have naturally drained across site 1 to the river Leam.

Runoff from the above two sites is due to a combination of increased runoff due to urban development, with storm drains being unable to cope with high intensity rainfall events plus the fact that much of the land is underlain especially to the south east of Offchurch Lane is underlain by boulder clay. See Geology map and key attached in Appendix 1.

"Climate change predictions suggest that there will be an increase in these more extreme rainfall /runoff events. Flood Risk Assessments for new developments should adopt an increase of 30% in peak rainfall intensity for developments to be still in existence by 2085". Reference document, **The Environment Agency. Standing advice to Local Planning Authorities on Development and Flood Risk**

Site 1. Surface Geology. This is underlain predominantly with "head" material. The field acts as a soak away area for water running off the hill to the south east. By removing this ability to absorb this natural runoff water from the extended catchment, there will need to be extended mitigation works to manage this water plus the additional runoff from the built site once it has been developed. A balancing pond has been proposed by the developer to ameliorate runoff from the hard developed site. This will also need to accommodate additional waters running onto the site from the hill to the south east of Offchurch Lane.

Evidence of the significant surface water flooding from the hill south east of Offchurch Lane onto Site 1.

1. 16 Offchurch Lane. This is my house and it was flooded in an intense rainfall event in 2007. The footpath opposite my house issuing onto Offchurch Lane became a watercourse discharging significant flow into the road. This was exacerbated by urban runoff from the Greswoldes and Chance Fields. The drains in Offchurch Lane were unable to cope and storm water entered via my neighbor's property and flooded the downstairs inside house areas causing significant damage and resulting in insurance claims'. I have now raised the entrance to the house to stop this happening again. This water now drains through our back gardens and soaks away into the field.
2. Flood water running off the fields south east of Offchurch Lane which enters Site 1 between houses number 34 and 38. This latter site is also the site where a " potential pedestrian/cycle/emergency access " to site 1 is proposed. The land adjacent to southeast of this site is agricultural land and is normally set to wheat. The hill running down to Offchurch Lane forms a natural bowl and the low area extends down to the farmers gate. In periods of high rainfall, overland flow develops in this hollow and is sufficient to surcharge local drains where it reaches the road through the farmer's gate. The water then flows over the road and down the farmer's access and drains into Site 1. I have observed this on a number of occasions and has been recently verbally corroborated by residents in house number 38. Their view is this is an approximately annual occurrence (i.e about 1 in 1 year return period). See pictures of the site below. In extreme events the residents of 38 have seen water ponding outside their house. I believe that the property flooded prior to the current occupiers living there.

1. Flooding site. Water runs across the road to potential pedestrian access to Site 1
2. Field to south east of Offchurch Lane where water runs off from a natural bowl.





The above two examples are indicative of the degree of runoff on to Site 1. Development on Site 1 and removal of this natural soak away will lead to flooding within the area of development. Runoff from this area has been noted by other residents of Offchurch Lane.

Current approval to mitigate the flood risk on this site will require the developer to provide a Flood Risk Assessment plan to Warwickshire County Council Sustainable Urban Drainage System Approval Board to show that they comply with the Environment Agency requirements for limiting urban flooding. This is a category 1 site so it does not have to go the Environment Agency for approval.

The developer will have to put mitigation works in place to ensure that they do not release more than 5 litres/second per/ hectare back to the water course (presumably the Grand Union Canal) in a 1 in 100 year return flood event. This equates to the runoff from a natural greenfield site. The calculation of runoff to the proposed balancing pond should take account of the runoff from the development, but it can be argued that it should also account for runoff from south east of Offchurch lane, which would have naturally soaked away into the field prior to development.

I would like to see an independent objective assessment/audit of the calculation of the balancing pond capacity.

The Environment Agency. Standing advice to Local Planning Authorities on Development and Flood Risk suggests that –

“For on/near site flooding for events with a return-period in excess of 30 years, surface flooding of open spaces such as landscaped areas or car parks is acceptable for short periods,”

“No flooding of property should occur as a result of a one in 100 year storm event (including an appropriate allowance for climate change). In principle, a well-designed surface water drainage system should ensure that there is little or no residual risk of property flooding occurring during events well in excess of the return-period for which the sewer system itself is designed. This is called designing for event exceedence.”

This means that no property can be built within the designated flood risk zone and that mitigation steps will be required on the periphery of such sites, such as raising properties above 1in 100 year flood risk zones.

Water Quality. The River Leam is designated as a **nitrate sensitive area** due to the fact that the river is used for drinking water abstraction at Willes Meadow a short distance downstream. Runoff from Site 1 needs to take account of the water quality considerations in that surface runoff will eventually end up in the River Leam. The whole area is designated a **nitrate vulnerable zone**.

Drinking water protected area.. The whole of the land area of Site 1 is designated a **drinking water protected zone**. NB Site 2 is not within the zone. It is also designated a **Surface Water Safeguard zone**. Runoff from Site 1 needs to take account of the water quality considerations.

4. Ecology

Site 1. The field and its periphery form an important habitat to a wide range of birds, mammals and to lesser extent, reptiles.

Its close proximity to the Newbold Common and the Welches Meadow nature reserve and the Leam Valley make it an important habitat for wildlife and particularly birds using the reserve. See map 1.

Birds. A wide range of birds can be seen over the period of the year using the field for grazing/foraging. Most important are large flocks of Graylag and Canada geese. These can be seen in large numbers in the field in the autumn time after harvesting. Flocks of lapwings are also seen grazing the field at this time. It is also used as hunting ground for birds of prey such as buzzards and kestrels. I have also seen flocks of mallard ducks grazing in the field. A pair of Mallard Ducks arrives in the spring every year from the field and is often seen in my garden. Pheasants are regular visitors from the field in my garden and are often seen in and around the field.

Bats. A number of residents along Offchurch Lane report bats in and around the periphery of the field. Bats have been regularly seen by me every summer and autumn since I have lived here. Bats must therefore roost in the vicinity of the field

Mammals The field forms a strong interconnection to the surrounding countryside and as a consequence a variety of mammals are seen in and around the periphery of the field. I have seen Muntjac deer frequently over the 19 years I have lived here. I have seen Roe deer (both male and female) in the field on number of occasions particularly over the last 2 years. Foxes can be seen in the field and around its periphery on an almost daily basis. In spring a family of foxes and cubs are seen in the field most years. Other mammals seen by myself around the periphery of the field are rabbits, moles, stoats, squirrels.

Reptiles. I have seen grass snakes, newts, toads and frogs in my garden which I assume have migrated from the surrounding countryside.

By developing on Site 1 and removing the field as a habitat, the above listed species will disappear.

The WDC environment report stated that the ecological sensitivity for this site was LOW. Bearing in mind the known presence of bats, wetland birds and other wildlife identified above it should be rated as MEDIUM.

5. Highways

A recent traffic report by Woods Ferrer Ltd commissioned by Radford Semele residents concluded –

1.Any development to the north of the A425 in the vicinity of the preferred site would be on the wrong side of the main road, and on the opposite side of the main road to the services and facilities in the village. Given that village facilities are located to the south of the main road, the development of the preferred site would force pedestrians to have to cross the busy A425. Although there is an existing pedestrian crossing on the A425, near to Church Lane, pedestrians are likely to cross Southam Road elsewhere too. This is undesirable in highway safety terms.

2.If a vehicular access were provided to the preferred site from Offchurch Lane, poor junction spacing would result, and queues would worsen. An access on Offchurch Lane would also have to cope with traffic travelling at speed when turning left into Offchurch Lane from the A425.

3.It would be undesirable for all of the traffic likely to be generated by the development of the preferred site to pass through the Offchurch Lane junction. It would be equally undesirable for the other access option at Church Lane to have all site traffic passing through the crossroads junction with School Lane and the A425.

6. Archeology

The village is mentioned in the Domesday Book.

“From Thorkil, Ermenfrid holds 5 hides in RADFORD SEMELE. There is land for 13 ploughs. In demesne are 3 ploughs, and 8 slaves; and 19 villans and 8 bordars with 9 ploughs. There is a mill rendering 6s8d., and 12 acres of meadow. It was worth 100s.; and afterwards 40s.; now 6l. Edwin held it freely”

There have been a number of historic findings dating back to Medieval times in and near to Site 1. There is a reference to a “medieval sunken village” in the field opposite the White Lion Pub. A number of these finds have been formally registered with the Warwick Museum HERS database. The Church dates back to medieval times C12 C13. There is a medieval village nearby it is highly likely that there could be many artifacts in this area.

Consequently, this site (Site 1) is likely to be significant from a historical point of view.

Prior to any development of the site, archeological excavation at trial sites across Site 1 should be undertaken to assess the potential for further finds before they are destroyed by development work..

7. Access to amenities

All the amenities of the village lie to the south side of Radford road. A development on site 1 will be dislocated from the main village amenities. Pub, shops, post office, community hall, school, Social club, Methodist Church. The traffic report has highlighted the potential problems of people crossing the busy Southam Road. People will resort to driving to these amenities which would exacerbate the traffic issues.

The proposed **site 2** would however be accessible to all village amenities.

8.1994 Planning Inspectors Local Plan report.

Warwick District Council put forward vociferous objections to the development of site 1 that can be summarised as follows,

- ***The site is an attractive area of land separated clearly and distinctly from the main area of the village south of Southam Road.***
- ***Site and its setting is one of the last connections with the areas rural past.***
- ***Site is not properly in the village being wholly peripheral***
- ***Village Green proposal would not replace the rural setting***
- ***Site would not relate well in scale or location to the village***
- ***Site is detached from the village severed by the main road.***
- ***Development of the site would close the open outlook of the land and affect the impression of separation of Leamington and Radford Semele***
- ***The site was considered not to be of a nature that could be included in a village envelope.***

The issues that were raised in 1994 are of equal weight and relevance in 2014.

The site has not changed in terms of character, use and landscaping.

There has been no development within or around the site that has eroded its contribution to the landscape quality of the area.

The Council was quite clear in arguing that the site was outside of the main part of the village being “**clearly**” and “**distinctly**” separated from what is considered the main part of the village south of Southam Road.

The site remains separated and detached from the main part of the village and as a consequence cannot agree that issues that were raised and defended by the Council in 1994 are now set aside simply because there is a need for housing in the area.

9. Land Quality and 1984 application to develop houses on site 1.

MAFF produced a detailed report in 1984 in response to a planning application to build on Site 1. WDC at that time dismissed an application to build houses by Bryant Homes on Site 1 following wide ranging opposition from Radford Semele residents. Bryant Homes appealed, but then finally withdrew its appeal application subsequent to the MAFF report publication, which vociferously defended the need to keep the land undeveloped as it was considered as prime agricultural land.

The land is Grade 3a or 3b agricultural land. The farmer has made significant efforts to upgrade the land Organic status which has involved taking a loss whilst the land lies fallow. Since then the land has seen many successful crops over the years. The loss of 5.4 hectares of good quality organic grade agricultural farmland is bound to be a significant loss to UK food production.



The field is renowned in the village and afar for its lovely spectacular poppies which bloom from time to time. This is enjoyed by all the village community and visitors. The loss of this vista will impact on the overall village community.

Section 5 – Local Plan. Site Selection Process & Methodology.

Comments.

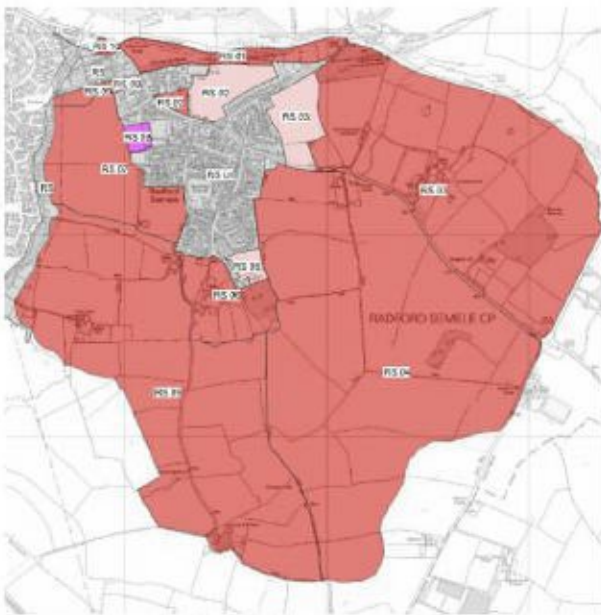
I was only made aware of Site 1 being adopted by WDC in October 2013. Radford Semele Parish Council and the previous leader of the Council – Michael Doody were also only made aware of it in October 2013. This was less than one month before the Local Plan went out to public consultation. Gladman (the site promoter) had been in touch with the planning department regarding proposals to develop site 1 for over a year before the consultation process. (comments made by S Hay (Planning Officer) at the public meeting in Radford Semele.) This represents an appalling lack of transparency in local consultation. Residents with interests in other sites in Radford have had literally years to develop their arguments and robust cases for objections; whereas those with interests in the new preferred site 1 have had less than a month. This does not represent a level playing field in the Planning Process. I believe this planning process has fallen well short of the spirit of local consultation that is set out in Planning Legislation. **I will be considering a representation to the Planning Ombudsman.**

This latest Consultation sees a new site (Site 1) entered onto the SHLAA and stated as the preferred option. This site (Site 1) had previously been removed and is referred to in the 1994 Planning Inspector's report where the Inspector states "... remaining land, including the Objection site, omitted, to be protected by countryside policies". The Radford Semele Parish Council made representation around October 2012 based on the previous Consultation which completed June 2013. They stated that their preferred location for new housing was on the east side of Radford Semele (i.e. Sites 2 & 3). Since then WDC have not been proactive in informing and engaging with the Parish Council over Site 1 which was an unknown option until November 2013. The process and methodology makes it very clear that WDC should have engaged to obtain the Parish Council's view and has not done so. This is particularly important since Site 1 is now their preferred option (although based upon very dubious evidence). I strongly object to the process the WDC has gone through to reach their decision and to commence their Consultation.

3.1 Environmental - Sites 2, 3 should not have been discounted by WDC.

Environmental Report carried out By WDC

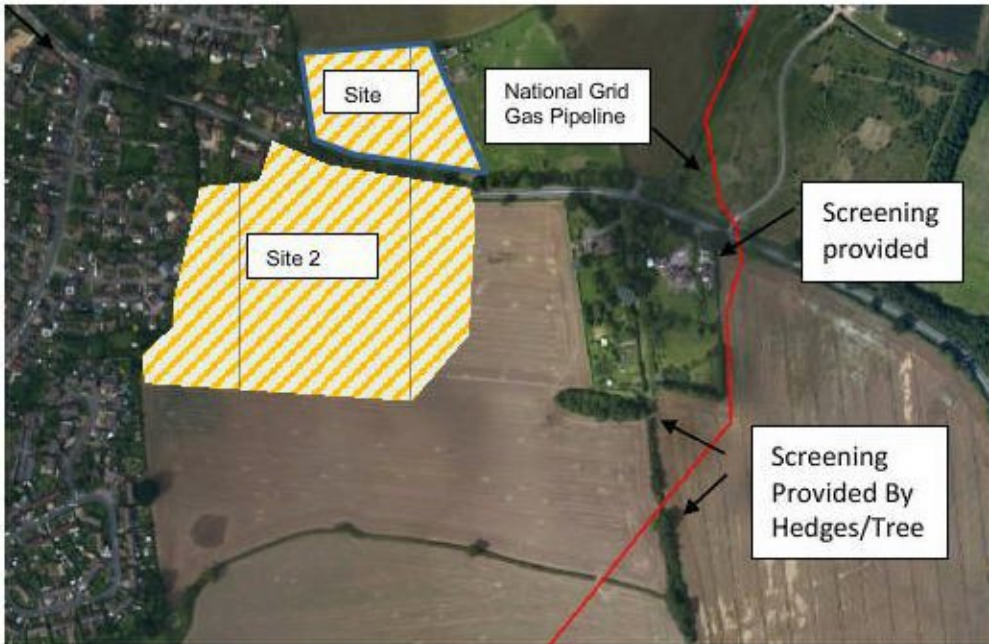
The environmental report carried out for Sites 2, 3 (RS 03, RS 04 & RS 05) have large parcels of land. These do not represent the areas of land under consideration in the Local Plan.



For example RS 04 is some 10-15 time larger than Site 2 and encompasses an area of land stretching from Radford Semele down to the Fosse Way and back to the railway. When assessing this area for visibility one is bound to get a report that shows the area to be highly visible. For RS 04 the WDC report clearly stated that visual impact would be high from along the Fosse and surrounding Areas. However, in reality from the Fosse Way, looking west, there is a ridge which would hide any development in Site 2 when looking from this point. Moreover Site 2 is not visible until you round the bend in the A425 just adjacent to the site as it is screened by the natural undulations in the landscape and by buildings and hedgerows. Site 2 does have some views to open countryside to the south but these are small and not from public spaces. For this reason visibility is considered to be MEDIUM-LOW.

The protected visibility of Site 2 is clearly demonstrated in the aerial view below where it can be seen there is natural screening to the east of site 2. Consequently, this report is not representative of the parcels of land known as Sites 2, 3 and should not be used as evidence.

In considering this fact and that Sites 3 and 4 are similar I have concluded that Sites 2, 3 and 4 are far better sites from an environmental viewpoint to accommodate housing. However, Site 4 does have the disadvantage that it can be viewed from Sydneham and Whitnash.



Aerial View Sites 2 & 3 1

3.2 – Access into Sites

3.2.2 – Sites 2 & 3

A highways report was not provided as evidence in this consultation. However, it would look like WDC and highways have carried their Access assessment based on the existing 50MPH speed limit alongside Sites 2 & 3. WDC have also stated that it would be inappropriate to reduce the speed limit to 30 MPH if housing was to be on one side of the road.

The DOT advice on speed limits for villages circular 1/06 (available on WDC website) section 6.3 and DOT circular 01/04 state the following.

1111 - *“It is therefore government policy that, where appropriate, a 30 mph speed limit should be the norm in villages.”*

1112 - *“For the purpose of applying a village speed limit of 30 mph, a definition of a village can be based on the following simple criteria relating to frontage development and distance:*

- *20 or more houses (on one or both sides of the road); and*
- *a minimum length of 600 metres.”*

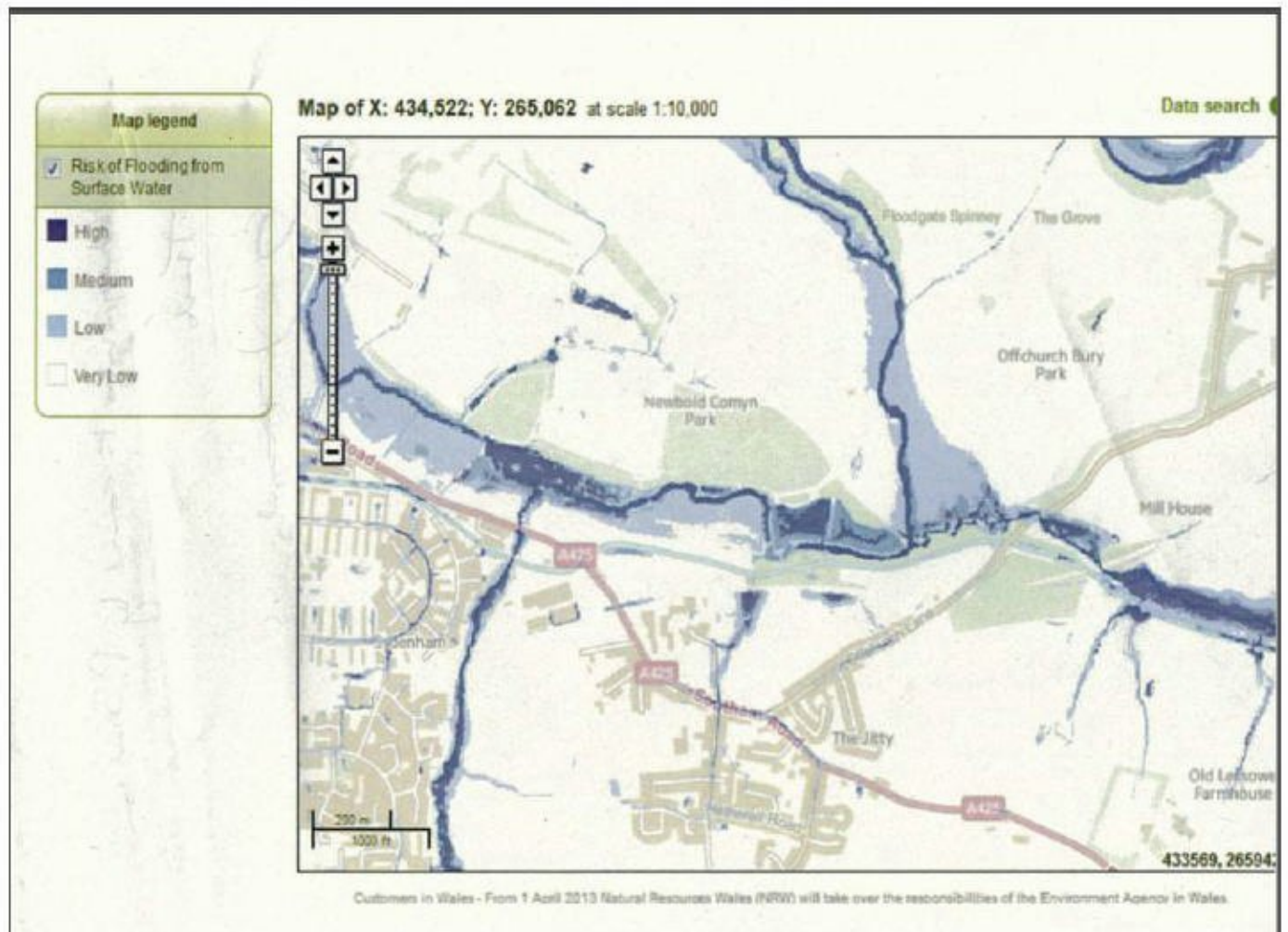
Consequently a speed limit of 30 MPH should apply as the village boundary will need to be changed to include any new housing estate whether it be on one side or both sides of the road.

Two independent highways experts, one sourced by residents & one by Taylor Wimpey (who I understand have an interest in Site 2) have carried out Access Visibility Splays at 50MPH and have concluded that Access can be achieved at this speed. However, based on the speed limit policy used by WDC the 30MPH speed limit would have been extended beyond Site 2 making an access onto the A425 from these sites perfectly achievable.

Consequently, there is no reason why Sites 2 & 3 should have been discounted and I would ask WDC to reconsider Access to these sites in accordance with policy and the advice of traffic experts

Appendix .1. Maps.

Environment Agency Flood Risk Maps



Surface Geology. Radford Semele.

