

Dear Inspectorate,

In response to your request for additional information relating to Norton Brook flooding following my OFH 1 comments:

1) Flood zones: The Environment Agency (EA) flood zones map for Norton Brook can be viewed at:

<https://flood-map-for-planning.service.gov.uk/map?cz=388605.4,184234.5,14.628371&seg=fz,fzpd>

The EA flood zones extend from Lords Wood Cottages and the railway line close to Great Store Barn to the south west, through Norton and Foxley, before joining the Sherston Avon.

I note that this official map actually identifies the water course as “Norton Brook” - which is what I’ve always called it. My OFH 1 comment on the water course being officially an unnamed “Tributary - source to conf Sherston Avon” was based on the Application document APP-012, which appears to be the DEFRA description.

2) Catchment area: The DEFRA map of the Norton Brook catchment area can be viewed at:

<https://environment.data.gov.uk/catchment-planning/WaterBody/GB109053027680>

Naturally this extends well beyond the EA flood zone maps and gives a wider view of relevant catchment area land.

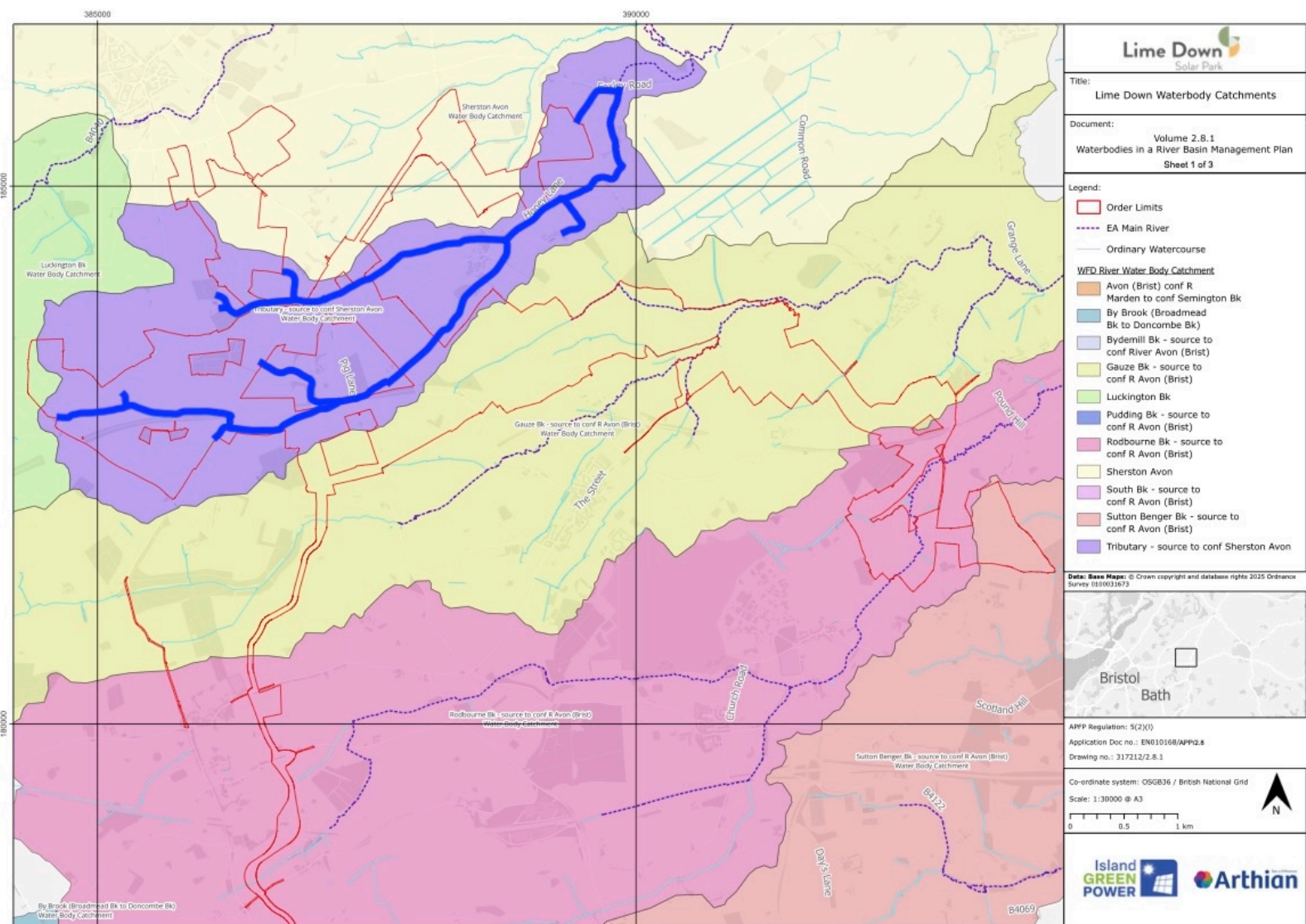
3) Proposed Development: A map of the Norton Brook catchment area overlaid with the location of the proposed Development sites can be found in Application document APP-012 - EN010168/APP/2.8 - “Waterbodies in a River Basin Management Plan” on page 3 (labelled as Sheet 1) and highlighted in purple. For clarity, I have provided a copy of that sheet below, highlighting the extent of the Norton Brook water courses in dark blue.

Our property is located on the eastern edge of Foxley, next to (upstream side of) the Norton Brook road bridge that leads to Malmesbury.

I have also appended below the script of my verbal Representation used at the OFH 1 event for your reference. Please advise if any additional information, such as photos of flooding, or a visit, would assist with your examination.

Regards,

Andrew Calderbank



Script

My name is Andrew Calderbank.

I am expanding on my written Representation, where I objected to the scheme primarily due to the risk of increased off-site flooding. Having reviewed the Application in detail with regard to flooding, I don't believe it adequately considers, or mitigates against the increased risk of off-site flooding from the PV sites **in combination**.

Specifically, I'm highlighting an **officially** unnamed water course that I refer to as Norton Brook, which appears a significant omission from any detailed consideration or investigation by the Applicant. This is despite the brook having a history of associated flooding to properties and roads, and it having a large catchment area within the proposed Development, primarily from site C, but also including parts of sites A, B, and D. These catchment areas combine around Norton to form the main body of the brook as indicated within Application

document APP-012 and identified as “Tributary - source to conf Sherston Avon”, highlighted in purple.

Today during storms, the volume of water at a given time in the brook can overwhelm bridges, causing the water to backup into properties, across roads and over land. If the proposed Development caused **any** increase in water runoff speed into the various water courses that feed the brook, it will contain a greater volume of water at a given point in time than occurs today, but would hit the same finite constraints posed by bridges etc., resulting in an increase in both the frequency and extent of flooding.

My key concerns are:

Firstly, that the combined effect of almost all sites draining into Norton Brook has not been adequately considered.

Secondly, that the only proposed mitigation for increased runoff speed from the PV sites is by establishing vegetation under the panels. However the effectiveness of such an approach in this case is speculative, because no study of **actual** peak flow behaviour has been undertaken in order to establish a current baseline for Norton brook. Without a baseline how can the Applicant, or anyone else, determine the effectiveness of the proposed mitigation?

Thirdly, during the Construction and early Operational phases of the Development there will be **no** mitigation of the increased flood risk because the proposed vegetation under the PV panels will take time to implement and become established.

I raise these issues based on my family’s experience of living for the last 35 years in a property that has occasionally been flooded by Norton Brook during storms. On those occasions the volume of water flowing down the brook at a given time exceeded the capacity of the adjacent road bridge, causing flood water to backup into our house. Essentially, the bridge becomes a dam.

Our house is not an isolated case.

Locally, and further downstream in Malmesbury and beyond, properties and infrastructure already have significant flood events, with costs and other impacts to many people. It is critical that nothing exacerbates what is already a challenging flood risk situation.

The issues I have identified within the Application have strengthened my belief that the choice of location is poor, and that it should not be approved.

Thank you