Mr Andy Mortimer
Spatial Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Our ref: SV/2009/103911/SL-04/PO1-L01
Your ref: Revised Preferred Options consultation

Date: 21 August 2013

Dear Sir

Shropshire Council SAMDev Plan – Revised Preferred Options consultation: 1st July to 23rd August 2013

I refer to your email of 1 July 2013 which notified us of 'Revised Preferred Options' as part of your Site Allocations and Management of Development Plan (SAMDev Plan) preparation.

We note that this consultation focuses **only on changes** to the settlement strategies and preferred options for new development published last year (2012).

Further to our 'Shropshire infrastructure meeting' on 30 May 2013 we advised that the above should consider our latest (November 2012) flood zone map update compared to the existing flood risk evidence base as the best available data at this time. This is in addition to the previous recommendation to consider those 'ordinary watercourses' that are not modelled and/or have no floodplain associated with them. We discussed that in some areas the floodplain as shown on our maps has become more extensive but in other areas it may have been reduced or removed. This has implications for sites previously proposed to be allocated and those that had been previously discounted. At the meeting we suggested you provide a 'clarification statement' to confirm the flood risk mapping changes and impacts for certain settlements to inform your decision making; and inclusion of appropriate text within the settlement strategy documents to explain the flood risk impacts (data)/changes for sites, to make it transparent.

We acknowledge the email from Dave Edwards in your Flood and Water management team which confirms that you have "looked at all current proposed sites against the revised fluvial flood maps released in November 2012".

With regard to **flood risk** we would make the following observations to assist your decision making.

Albrighton
We would recommend you seek the comments of your Flood and Water Management team to query where surface water is discharging to. We understand that there no/limited capacity in the Albrighton Brook.

Bishops Castle
Bucknell - the site was shown to be located in the high risk floodplain previously but modelling confirmed it was not at risk subject to conditions to ensure the development was safe.

Lydbury North - has 'ordinary watercourses' with no flood zones associated with them which will need assessing to inform the principle of development.

Church Stretton
CSTR019 (RESERVE Housing Site) and 027 (NEW PREFERED Housing Site) have 'ordinary watercourses' with no flood zones associated with them. W would advise that you need an assessment of potential flooding to give a reasonable degree of certainty that the site is appropriate in principle (sequentially); and can be developed and occupied safely.

CSTR018 (Housing Site Carried Forward – north of the school) has quite a significant proportion of land within Flood Zone 2 within the boundary. There are no watercourses in the immediate vicinity of the site so the risk could be either J-Flow/historic/surface water, or combination of these. As you are aware, from our Shropshire infrastructure meeting in May 2013 we (Rhys McCarthy) discussed how to model Church Stretton with you.

CSTR020 – (Site not carried forward). The site is located within Flood Zone 1 (low probability of fluvial risk) based on our current Flood Map. Some small ditches drain from Plocks Coppice to the north.

CSTR028 (alteration to settlement boundary) – The site is located within Flood Zone 1 (low probability of fluvial risk) based on our current Flood Map. It should be noted that a small ditch runs alongside the eastern boundary which appears to flow around Street Meadow.

Cleobury Mortimer
We would raise potential concerns over where the surface water will discharge to as we believe there is no/limited spare capacity in the Pudding Brook and some flooding issues. There is opportunity for developer contributions to improve current issues through appropriate measures/flood risk betterment, to help reduce flood risk in the town.

Craven Arms
It is noted that the majority of sites, for example those west of the A49 are located within Flood Zone 1 and/or have been drawn to fit in line with the flood zones, which we support, however the floodplain in Craven Arms is based on generalised flood mapping and therefore a detailed FRA showing clearly the extent of floodplain will need to be undertaken as part of any planning application submission.
The key area of change area (Mixed Use regeneration) is partially within floodplain (existing abattoir site is totally within Flood Zone 3) and should be looked at sequentially including development types. It should be noted that the site is likely to be subject to

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some constraints in order to comply with the NPPF. It should be noted that we have no modelled flood data for the River Onny to assist your SFRA update or a developer model.

CRAV030 (NEW preferred Housing Site) – A very small part of the eastern edge of the site borders Flood Zone 3 of the River Onny.

ELR053 - We are also currently in preliminary pre-application discussion with the potential development of 'new preferred employment site' ELR053 which is located at the edge of Flood Zone 3 and 2 of the River Onny (we have no modelled flood data) based on our map. However, there are a couple of 'ordinary watercourses' in the northern and southern parts of the site which require assessment.

Ellesmere
As stated in the report a FRA is needed for ELL003 to inform the extent of the site that is outside of Flood Zones 2 and 3 and to confirm the principle of development being acceptable. As you are aware, this work (assessment) is currently being undertaken by the applicant's consultant with a view to informing your decision making. We have provided a preliminary response to the applicant in relation to the information required to inform the scheme. However, at this time we are not party to any additional information. We can confirm that re-establishing an open watercourse will significantly change the flood regime and extent of flooding in this area and there could be significant flood risk betterment with other environmental enhancement.

Market Drayton
The Sych Brook (Main River) runs close to preferred housing site 'MD030'. Based on our current indicative Flood Zone Map – November 2012 update, there are parts of this site (to the north) adjacent to the watercourse which are within Flood Zone 3 and 2. However, it is likely that there will be developable areas subject to a detailed FRA and the principle of some development in Flood Zone 1 appears reasonable.

Preferred Site MD010 – Greenfields Lane and MD028 appear to be located in Flood Zone 1.

Minsterley and Pontesbury
The Callow Lane site in Minsterley will need a FRA to assess the 'ordinary watercourse'. As you are no doubt aware, there are known flooding issues associated with this watercourse downstream in Little Minsterley.

Pontesbury - We have recently been approached by a consultant and agreed the scope of the hydraulic modelling for the FRA to inform the site allocation (PBY018) at Hall Bank. From initial discussions with the consultant, there is flooding at the railway culvert due to capacity of the culvert and the FRA will need to demonstrate how much of the site is developable. PBY018 and PBY029 are likely to be developable subject to a detailed FRA.

Much Wenlock
We have provided comments in our letter of 21 June 2013 in response to the final plan submission including **Policy RES1.** For completeness, with regard to flood risk, the site is located within Flood Zone 1 (low probability of fluvial risk) based on our indicative Flood Map. However, our Flood Map does not show flooding for catchments less than

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3km2 or other sources of flooding. In the case of Much Wenlock the Flood Map starts downstream of Wenlock Abbey on the Shyte Brook (Main River). There is no reference to Strategic Flood Risk Assessment (SFRA) within the final plan submission.

Flood risk information presented at our meeting on 30 May 2013 suggested that parts of site RES1 may be at risk of flooding. This is based on modelling information produced by your Flood and Water Management team to help inform development proposals i.e. where ordinary watercourses and/or catchments less than 3km^2 or other sources of flooding affect site allocation, or planning applications. We recommended that this 'potential' flooding issue is identified for site RES1 and other locations as appropriate within Much Wenlcok. We recommended that this issue be clarified in the plan with information submitted to demonstrate that the development numbers proposed can be accommodated on this site, having regard to the Sequential Test as set out in the NPPF and supporting technical guidance/reference to Policy CS18 of the Core Strategy. It may be that modifications to ground levels and/or other strategic mitigation are necessary to ensure a sustainable development and a safe development in line with the NPPF.

Shrewsbury
Shrewsbury South SUE – Money Brook in the very west portion of the site has been modelled which confirms some Flood Zones 3 and 2 extents. This may limit development to the south of the Shrewsbury Town FC stadium. We provided a response to the planning application on the land to the north of Oteley Rd (south of the Rea Brook) to which we offered no objection subject to the detailed FRA.

We have also recently provided a response to the planning application for housing at land off Woodcote Way (SHREW120/R). Based on the detailed FRA and mitigation measures we have raised no objection. However the proposed flood compensation area utilises much of the land for the adjacent proposed development site.

Whitchurch
The 'preferred sites' appear to be located in Flood Zone 1.

Waste Water infrastructure (evidence base)

Separate to the above flood risk comments, we would reiterate our previous comments to the SAMDev, in relation to the need to update the waste water evidence base (Water Cycle Study) for a number of settlement areas. At our previous meeting in May 2013 you mentioned that you were awaiting some information from Severn Trent Water and Welsh Water to assist this further work.

I trust that the above is of interest.

Yours faithfully,

Mark Davies
Planning Specialist

Direct dial: 01743 283405

End

For Shropshire Council use Respondent no:

Shropshire Council
Site Allocations and Management of Development (SAMDEV) Plan

Pre-Submission Draft (Final Plan)
17 March 2014 – 28 April 2014

Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:
www.shropshire.gov.uk/samdev

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	Mark Davies
Organisation (if applicable):	Environment Agency
Address:	Hafren House, Welshpool Road, Shrewsbury, SY3 9DA
Email:	westareaplanning@environment-agency.gov.uk
Telephone:	01743 283405

If you are acting as an Agent, please use the following box to tell us who you are acting for:

Name:	n/a
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

OBJECTION to Site allocations (settlement policies) including S2; Policy MD5, MD8, MD14, MD15, MD17. Policy MD13 (support)

Is your representation in support or objection? (please tick as appropriate)

Support	**Yes**	☐	**No**	x
Object	**Yes**	x	**No**	☐

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	**Yes**	☐	**No**	x
Sound	**Yes**	☐	**No**	x

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply)*:

Positively prepared	
Justified	**x**
Effective	**x**
Consistent with National Policy	**x**

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

See details in our letter of 28 April 2014.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible
(Continue on a separate sheet if necessary)

See details in our letter of 28 April 2014.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.	**x**	No, I wish to pursue my representations through this written representation.	

If you wish to attend the examination, please explain why you think this is necessary in the box below:

In the event that our concerns cannot be addressed prior to the EiP, or if more up to date information/evidence becomes available.

Do you wish to be notified of any of the following? *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	x
When the Inspector's Report is published	x
When the SAMDev Plan is adopted	x

Please return this form by 5pm on Monday 28 April 2014

You can e-mail it to:
Planning.policy@shropshire.gov.uk

Or return it to: Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Please note, we will acknowledge receipt of representations made by e-mail.

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

Mr. Andy Mortimer
Planning Policy Manager
Shropshire Council
Abbey Foregate
Shrewsbury
SY2 6ND

Our ref: Shrop_SAMDev Preferred
Your ref:

Date: 20 July 2012

Dear Andy

SHROPSHIRE SAM DEV PREFERRED OPTIONS CONSULTATION

Thank you for referring the SAM Dev consultation, which we received on 20 March 2012. We wish to make the following comments and would welcome further discussions in progressing the policies and site allocations.

Flood Risk

Our previous response of 25 June 2010, to issues and options, acknowledged a commitment that the SAMDev would look at relevant site constraints including assessment of all flood risks.

Depending on what sites are brought forward (at the next stage) and the location, level of detail in the SFRA etc, risk, nature of the watercourse, existing modelling etc we stated that there may be a need to produce some modelling or assessment to identify/refine the risk to a site and inform developable areas etc. As confirmed in our response to the conclusions of the WCS final draft, 'there will be some watercourses that have not been subject to even the broad flood zone 3 or 2 type modelling, which whilst showing up as lower risk (flood zone 1) area may in fact be at risk. There may be a need to undertake further modelling or some other way of precautionary assessment to assess sites…'

The flood risk Sequential Testing of potential sites must be undertaken, in line with Policy CS18 of your Core Strategy and the NPPF, in allocating sites to meet the identified need of the District.

Wastewater Infrastructure

We are currently working with you on outstanding work to update the information within your outline Water Cycle Study (WCS) of June 2010. We advised you as part of the WCS recommendations that further work will be required as part of the SAMDev process. This was also confirmed and agreed in our 'statement of common ground' for the Core Strategy Examination in Public. Our more recent email of 30 May 2012 confirmed that due to the substantial change in size and/or location of development, we would recommend that the WCS is updated, preferably by external consultants.

Of note, it appears that the scale of development in Oswestry appears to have increased compared to that tested in the WCS.

As you are aware, we have discussed the potential need for modelling of particular locations. This will be refined based on information provided by Severn Trent Water and Welsh Water (e.g. St Martins, Whitchurch etc.)

Our email of 30 May 2012 also provided you with an indication of where information needs to be revised/updated or carried out (those areas not covered in the original WCS report) based on an appropriate assessment process. This should include a review of Consents to achieve 'good status' in line with the Water Framework Directive (WFD). As you are aware we have provided you with WFD water body information to assist this aspect.

***Clun catchment* -** We have also raised with you the need to consider the Clun catchment which as well as the above WFD requirements, should be assessed in accordance with the Habitats Directive. As you are aware this requires your engagement with Natural England on emerging (more stringent) conservation targets i.e. to inform an appropriate policy approach.

We have previously sent you and Natural England phosphate data and phosphate apportionment information for the Clun catchment to assist your discussions and final evidence base.

Water Framework Directive (WFD)

I enclose a copy of a map showing the broad locations of WFD status within Shropshire for your information (evidence base). For example, the Rea Brook waterbody in Shrewsbury has a 'moderate' ecological and biological classification. The objective is to achieve good status by 2027 (for all waterbodies). This is a broad mapping of constraints. However, more detailed information can be made available, for your GIS system, to help inform detailed site specific proposals. Annex B of our Severn River Basin Management Plan (2009) also contains information on the classification of each individual waterbody.

Development should consider WFD status to ensure no deterioration and to achieve ‘good status’ in surface waters, groundwater and protected areas. Development proposals must not adversely effect and lead to deterioration of WFD water body status. Opportunities for improving and enhancing watercourses should therefore be sought through development. Delivery of WFD benefits through SuDS and measures to reduce pollution is essential to help meet the required status and protect controlled waters. Restoring ‘natural’ watercourses through the removal of culverts and hard engineered structures, physical improvements to riverbanks and habitats, development of green infrastructure, overcoming barriers to fish movement, are relevant options for development projects.

Many WFD delivery mechanisms have been secured within the adopted Core Strategy e.g. requirement for upgrades to local water infrastructure (wastewater sewerage and treatment). The evidence base needs completing as part of the SAMDEV sites…. water efficiency (sustainability checklist). sustainable drainage and surface water management plans.

We have previously discussed, at WCS meetings, the possibility of updating your 'sustainability checklist' – surface water management form (which is linked to Policy CS6 of the Core Strategy) to include WFD references and requirements. This would assist developers, decision makers and compliance with WFD. For example section 9 of the surface water management form document, which already includes a basic consideration of wider multi functional benefits, could be expanded and improved. We are happy to discuss this with you.

We have recently issued a publication on rural SuDS (links below) which provides options for farmers and land managers to build sustainable drainage systems on their land, to help reduce the risk of flooding and water pollution linked to WFD and climate change. This is one such reference that could be provided within the updated guidance and within your surface water management form (discussed further below)
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http://publications.environment-agency.gov.uk/PDF/SCHO0612BUWI-E-E.pdf

http://publications.environment-agency.gov.uk/PDF/SCHO0612BUWH-E-E.pdf

MD3 Employment sites

It is essential to ensure that proposed location is appropriate and careful consideration is given to pollution potential of activities. Reference should be made to our Pollution Prevention Guidance notes – *http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx* and our Groundwater Policy and Practice (GP3) to protect controlled waters and meet WFD objectives.

MD4 Key areas of change/Shrewsbury

There are potential contaminated land issues associated with the northern corridor where former industrial areas are to be redeveloped. Much of this area is located on the Permo-Triassic Sandstone. This is a principle aquifer of strategic importance for water supply. Parts of the area are also located within a Source Protection Zone (SPZ). Any remediation/land use/development design therefore needs to be carefully controlled to maximise protection of the water environment.

We would question whether a policy such as "enhance the role of the river and access to it", leaves the watercourse vulnerable to unsustainable development through potential development such as floating restaurants and inappropriate moorings. We would recommend that this section seeks to 'preserve and enhance the environmental value of the River Severn through Shrewsbury'.

MD5 sites for sand and gravel workings

A detailed environmental assessment would be required with any proposed planning application for sand and gravel workings. As part of this a water features survey must be undertaken to identify any wells, springs, boreholes, watercourses, pools or other water dependent features, including private supplies in the area. The removal of the superficial deposits has the potential to adversely impact upon the quality or quantity of water supplying such features. The potential impact on any identified features would need to be fully assessed at the planning application stage. Opportunities for WFD enhancement and post restoration betterment should be sought.

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In the event that sufficient information is provided to demonstrate that potential environmental impacts are unlikely and can be mitigated and planning permission is granted, we would be likely to require a long term monitoring scheme (in full force for the duration of operations) to ensure that any potentially adverse impacts (risk of deterioration to the groundwater/water features) are identified and any cause of deterioration is identified and remediated.

The following key points are provided on the proposed site allocations, although it is difficult to fully assess the proposals at this stage given the nature of the consultation (limited detail on the proposals):

Morville Quarry Extension M1:
The site is underlain by sands and gravels and till deposits which are in turn underlain by the Raglan Mudstone. There are a number of potentially adverse impacts on the water environment that could arise due to the proposed activities. These aspects will require full consideration.

The site is in close proximity to a watercourse. It would be necessary to demonstrate this will not be adversely impacted by the proposals as it may be sensitive to any water level changes/reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

Ensuring appropriate restoration measures are also key in terms of protecting water resources.

Bridgwalton Quarry extension M12:
The site is underlain by sands and gravels and till deposits which are in turn underlain by the Raglan Mudstone. There are a number of potentially adverse impacts, on the water environment that could arise due to the proposed activities. These aspects require full consideration.

The site is in close proximity to a watercourse. It would be necessary to demonstrate this will not be adversely impacted by the proposals as it may be sensitive to any water level changes/reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

Ensuring appropriate restoration measures are also key in terms of protecting water resources.

It will be important to consider the potential cumulative impacts of the Bridgwalton and Morville extensions.

Cannebuff Quarry M19 (42.38 Ha):

The site is underlain by a sequence of sands and gravels which are in turn underlain by the Permo-Triassic Sandstone (a principal aquifer of regional strategic importance for water supply). The site falls within SPZ3.

It is not clear as to whether the proposed activities would involve de-watering of excavations or whether there are any perched groundwater systems that would be passively de-watered as a result of the excavations.

There are a number of potentially adverse impacts that could arise due to the proposed activities (primarily any de-watering and the act of excavation potentially passively draining any perched groundwater systems). These aspects require full consideration.

The site is in close proximity to a number of protected habitats and ancient woodland sites including deciduous woodland. It would be necessary to demonstrate that these features would not be adversely impacted by the proposals as they could be highly sensitive to any water level changes/ reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

Ensuring appropriate restoration measures are also key in terms of protecting water resources.

Wood Lane proposed extension (Ellesmere):
The site is underlain by a complicated sequence of superficial clays, silts, sands and gravels. It is likely that there will be multi-level groundwater systems present.

The current activities require de-watering of excavations to win the sands and gravels. There are a number of potentially adverse impacts that could arise due to the proposed activities (primarily any de-watering and the act of excavation potentially passively draining any perched groundwater systems). These aspects require full consideration.

The site is in close proximity to Colemere and a number of protected species/local wildlife sites including deciduous woodland. There is also an area of peat to the east of the proposed extension. It would be necessary to demonstrate that these features would not be adversely impacted by the proposals as they could be highly sensitive to any water level changes/ reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

There is the potential for any impacted groundwater beneath landfilled areas to be mobilised by the proposals.

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

Ensuring appropriate restoration measures are also key in terms of protecting water resources.

Ternhill quarry:

The site is underlain by sands and gravels which are in turn underlain by the Permo-Triassic Sandstone principal aquifer.

There are a number of potentially adverse impacts that could arise due to the proposed activities (although it is unclear as to whether any de-watering is to take place at the site although excavation can potentially passively drain any perched groundwater systems). These aspects require full consideration.

The site is in close proximity to a number of local wildlife sites/protected species such as deciduous woodlands. It would be necessary to demonstrate that these features would not be adversely impacted by the proposals as they could be highly sensitive to any water level changes/reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

There is the potential for any impacted groundwater associated with the landfill areas to the east or other former site uses to be mobilised as a result of the proposals. Site investigation would be required in order to characterise ground conditions (nature and quality).

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

Ensuring appropriate restoration measures are also key in terms of protecting water resources.

Gonsal quarry extension proposals:
The site is underlain by sands and gravels which are in turn underlain by the Carboniferous Salop Formation. There are a number of potentially adverse impacts that could arise due to the proposed activities. These aspects require full consideration.

We have provided pre-application comments on this site and had discussions in 2009 with Salop Sand and Gravel.

Information requirements include a Flood Risk Assessment (some works likely to be within the 1% plus climate change flood extent including access road and brook crossing), which should assess the Cound Brook and its corridor. Hydrological and hydrogeological investigation (potential dewatering impacts) and ecology reports (potential for great crested newts). Opportunities for WFD enhancement and post restoration betterment.

Need for the application to consider the potential hazard that may arise from leachate entering the quarry workings from the Grove Farm Landfill that is located only 80m from the perimeter of the Quarry.

The site is in close proximity to a number of local wildlife sites/protected species such as deciduous woodlands. It would be necessary to demonstrate that these features would not be adversely impacted by the proposals as they could be highly sensitive to any water level changes/reductions in aquifer storage. A detailed conceptual model of the area (based on site specific geological and monitoring information of at least 1 year in duration) would have to be devised to assist in the assessment.

Any subsequent discharge from the site would have to be controlled and of a sufficient quality not to result in adverse impacts.

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Ensuring appropriate restoration measures are also key in terms of protecting water resources.

MD6 Gypsy and travellers sites

We note the proposed policy direction for allocating gypsy and travellers sites, provided in policy MD6. In allocating sites the following points should also be considered:

Policy B (11, e) of the Planning Policy Statement (PPS) on 'Planning for Traveller Sites' states that Local Planning Authorities should ensure that their policies do not locate sites in areas at high risk of flooding, acknowledging the particular vulnerability of caravans, classified a 'highly vulnerable' use in Table 2 of the Technical Guidance to the NPPF. The flood risk Sequential Testing of potential sites must be undertaken, in line with Policy CS18 of your Core Strategy, in allocating sites to meet the identified need of the District.

In considering the use of brownfield sites, we would support a reference to new sites not being located on contaminated land unless it is demonstrated that appropriate mitigation/remediation can be achieved. In establishing this, proposals (planning applications) for sites with a previous contaminative use would need to be accompanied by a desk study report, as a minimum requirement. In the event of potential contaminated land issues arising from this report, then site investigation works may also be required at this stage to inform appropriate remediation (and verification).

Applicants should ensure that satisfactory water supply and drainage requirements are in place for new sites. We do not encourage the proliferation of non-mains drainage. The allocation of sites should be informed by the work being undertaken to update the Water Cycle Study for the District area. Notwithstanding this, applicants will need to provide sufficient information at the planning application stage to confirm that they have sought a connection to the mains foul sewer in the first instance, as the preferred most sustainable option, in line with Planning Circular 3/99 'Planning Requirement in Respect of the Use of Non-Mains Sewerage in New Development'. This is linked to Policy CS18 of your Core Strategy and your Sustainability Checklist for foul drainage assessment.

MD7 Sustainable urban extensions

We would recommend that you consider joining this up with some of the surface water management plans that are required, in discussion with your Flood and Water Management team. However we note that detailed draft masterplans are being prepared which will be consulted upon in 2012.

MD9 Managing development in the countryside

The issue of appropriate foul drainage provision is particularly important in such settings. Within Shropshire there are many people who rely on private water supply wells, boreholes and springs for their potable water. It is partly for this reason that proliferation of non mains is not encouraged and any such systems that are permitted must be appropriately located and designed to maximise protection to any specific receptors and the water environment as a whole. You could link this to Policy CS18 and sustainability checklist for foul drainage assessment).

MD10 Infrastructure provision

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We welcome the inclusion of this policy to cover waste water infrastructure, but it will need to be informed by the water cycle strategy evidence base work which is outstanding.

New infrastructure (page 4) –

- Biomass energy proposals should include all relevant 'emissions such as air quality', noise dust, odour...

Our position statement and further information on Biomass, along with Anaerobic digestion is at: http://www.environment-agency.gov.uk/research/library/position/116111.aspx

Hydro Electric Power schemes should include 'water resources' and 'ecology' as relevant impacts. We would recommend a link or reference to the requirements of our Good Practice Guidelines (2009) http://publications.environment-agency.gov.uk/PDF/GEHO0310BSCT-E-E.pdf
This is due to be updated in the near future following a revision and consultation, details of which are available at:
https://consult.environment-agency.gov.uk/portal/ho/br/gpg/review

Our position on hydropower is at:
http://www.environment-agency.gov.uk/research/library/position/110175.aspx

We would be happy to discuss the above statements in more detail with you.

MD13 Tourism facilities

We would be happy to discuss any options/proposals or policy guidance for river based marina systems.

From a flood risk perspective we would welcome guidance on the 'managed retreat' of any static caravans, chalets and cabins in unsustainable locations i.e. that could be relocated from areas at flood risk. A policy line could be added to ensure consideration of the relocation of existing caravans, chalets and park homes to land outside of the floodplain.

MD14 Protecting and enhancing Shropshire natural environment

Policy CS18 covers water management. However this policy could include reference to WFD as discussed above. The impact upon designated sites e.g. from permitted activities (such as intensive poultry), and links to constraints / requirements could be included in this section.

MD15 Waste management

We need to ensure that waste management facilities are located appropriately with reference to documents such as our Groundwater Policy and Practice (GP3), landfill location policy etc. Whilst there are no proposals for additional landfill capacity in this consultation documents we would support a criteria based policy to assess any potential landfill or land raising activity that may come forward in the plan period.

Cont/d..

We would be happy to discuss relevant criteria to help guide applications for landfill, but also in vessel composting or anaerobic digestion, open composting, energy from waste etc. As you are aware, we regulate many potentially polluting activities including the above under the Environmental Permitting Regulations (2010), some dependent on scale and nature etc. Those that fall outside are regulated by your Council. Any planning application for the above activities should provide an appropriate level of detail to inform a reasonable degree of certainty on the planning application and to ensure the principle of the development/use of the land is acceptable (NPPF paragraph 122 refers) with cross reference to permitting constraints. It would be useful to discuss this aspect and possible policy wording with your Development Management (waste) colleagues, given the number of recent complex cases and serious concerns. We have recently sent you a consultation – 'Guidelines for developments requiring planning permission and environmental permits - Working draft May 2012' which provides more detail on the above approach.

As suggested in MD14 above, it would also be useful to include some criteria for intensive poultry applications which is a key issue in Shropshire. For example you could join up the planning and permitting issues and criteria based assessments for emissions such as 'air quality' i.e. need for ammonia screening etc. This is a particular issue where such proposals are within proximity of a 'designated nature conservation site' as follows:

The first stage of the ammonia screening assessment identifies if there are any European sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites) within 10km, SSSI's with 5km and other conservation sites within 2km of the site application. Similar to waste applications, there are overlaps with regulation and therefore a need for discussion with your Public Protection team. The intensive poultry detail might fall within Policy MD14, to protect the natural environment including those designated sites, rather than in the waste section.

General waste points –

Planning Policy Statement 10 – Waste ensures that development incorporates the new waste hierarchy set out in the revised Waste Framework Directive. This can be found here: http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement10 . PPS10 details how waste should be considered as a valuable resource. Reference is also made to the waste hierarchy. Please ensure that you are using the waste hierarchy from the revised EU Waste Framework Directive, implemented by the Waste Regulations (2011). The Waste Regulations (England & Wales) implement the revised EU Waste Framework Directive, which sets requirements for the collection, transport, recovery and disposal of waste. The Waste Framework Directive is the primary European legislation for waste and sets out the requirements for waste policy, strategic waste planning and the regulation of the waste management industry and producers of waste. The main changes include the emphasis on using the revised waste management hierarchy and since 28 September 2011 there must be a declaration that the waste management hierarchy has been applied. The hierarchy defines re-use of materials and how it distinguishes between recycling and other recovery.

The revised Directive seeks to increase the use of waste as a resource and to place greater emphasis on the prevention and recycling of waste, while protecting human health and the environment.

MD16 Landfill and land raising site

Cont/d..

We would welcome more encouragement of zero waste to landfill.

The draft policy confirms that proposals must 'comply with relevant water management and protection policy requirements'.

Our landfill location policy is at:
http://www.environment-agency.gov.uk/static/documents/Business/RGN_LFD1_Landfills_(v2.0)_30_March_2010.pdf

This makes reference to our Groundwater Policy and Practice (GP3), which states:

"The Environment Agency will object to any proposed landfill site in groundwater Source Protection Zone 1.
For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes, and the natural setting and properties of the location.
Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Environment Agency will object to sites:
- below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters;
- on or in a Major/Principal Aquifer;
- within Source Protection Zones 2 or 3."

MD18 Managing the development and operation of Mineral sites

The policy needs to include no adverse impact on 'water resources' as well as water quality. Again such activities must be appropriately located and controlled in order to protect controlled waters etc. We have provided some more detailed and specific comments in relation to the proposed quarries above (see MD5). We would wish to discuss the detail of criteria based policy with you further to ensure relevant issues are identified and addressed for all sites.

Site Allocations Preferred Options (18 Place Plans)

The following key information is provided to assist you in selecting your final site allocations for housing and employment. Please note that this is not an exhaustive review of all the sites. In addition, the selection of sites will need to be informed by your on-going evidence base updates on the Water Cycle Study and flood risk Sequential Testing:

Contaminated Land/Groundwater Vulnerability

Albrighton

ALB002 – The site is located on Secondary aquifer and within SPZ3. Any future development on MOD land would need to address potential contaminated land issues.

Bridgnorth

BRID001 – This is currently the livestock market so contaminated land aspects would have to be considered. There is a licensed borehole at this site which, if no longer used, would have to be appropriately decommissioned etc.

Cont/d..

W039 – Given the former waste management activities, pre-existing ground contamination issues would have to be assessed. The site is located on principal aquifer therefore appropriate pollution prevention measures would be required. The site is also located adjacent to a landfill site.

Broseley

The issues of potential ground contamination and land stability have been recognised in the document.

Church Stretton

A significant/sensitive constraint has been omitted from the assessment. Two of the proposed mixed use areas within the valley floor would be located within SPZ1 (inner zone) and 2 of the mineral water bottling groundwater sources. The other two sites are also close and potentially within the zone of uncertainty of the defined SPZ. The presence of the SPZ has potential implications in terms of land use/design etc. The sources are particularly sensitive as the boreholes take water from not only the underlying solid rocks but also the shallow highly permeable sands and gravels within the valley. Consequently any surface pollution could pass rapidly to the groundwater system and potentially the abstraction boreholes. This would therefore be a potential significant concern that would need to be addressed.
This is exacerbated by the fact that the groundwater is known to be at an extremely shallow depth. Issues for consideration would be the type of land use, surface water drainage, foul drainage runs, fuel infrastructure, foundation design and any pre-existing contaminated land issues. We would expect a detailed assessment of these issues in accordance our GP3 Policy.

Cleobury Mortimer

ELR067- The former sites uses give rise to the potential for contaminated land issues.

Community clusters- potential issues with proliferation of non-mains drainage although it is noted that generally relatively small scale development. Again there is the potential for private water supplies.

Craven Arms

The majority of the proposed development sites within the town appear to be predominantly greenfield, however this will need to be confirmed. The preferred sites overlie highly permeable sand and gravel deposits. The groundwater levels are also shallow. These superficial deposits have previously been used for public water supply, so are relatively high yielding. They will also provide baseflow to the Onny. Appropriate development design and location (including drainage and pollution prevention measures etc) will therefore be essential in this area.

A desk study and SI/remediation would be required to allow prior to the re-development of the existing abattoir site to ensure that potential land contamination issues have been appropriately addressed.

Elllesmere

Ellesmere area is underlain by complex sequence of superficial deposits comprising clays, silts, sands and gravels. This is in turn underlain by the Permo-Triassic Sandstone. The sandstone is of regional strategic importance in terms of water supply and more local scale water requirements and baseflow to watercourses can arise from the superficial deposits. The depth to groundwater across the area is highly variable with shallow groundwater systems present within the shallow drift deposits.

ELL004 – There is a landfill located100m to the east of the site.

ELL008 – The station yard and building have potential contaminated land issues, which need to be adequately addressed.

Cockshutt, Dudleston Heath, Dudleston and Street Dinas, Tetchill, Lee and Whitemere community hubs – need to ensure adequate foul drainage and water supply. The protection of existing private supplies is also of importance as there are a number across these villages. In addition, a number of these locations groundwater levels are known to be shallow and discharge of foul effluent to ground may not be appropriate.

Highley

Given the industrial heritage of the area, potential for ground contamination and land stability issues should be considered.

LB2004/00017 – is located approximately 70m to the east of a landfill site.

Ludlow

LUD017- The protection of existing private supplies of importance.

ELR059 - The site is surrounded by potentially contaminative uses, this should be taken into account.

Cleehill

There are potential issues with proliferation of non-mains foul drainage in this area.

Onibury

The protection of existing private supplies will be of importance.

Minsterley and Pontesbury

Given the industrial mining heritage of the area, there is the potential for land contamination issues.

MIN002- Groundwater is likely to be shallow at this site. There are also potential land contamination issues associated with the farming activities. There is a landfill approximately 160m to the south east of the site.

Much Wenlock

Cont/d..

We note that the Neighbourhood Plan will seek to bring forward sites for housing and employment and therefore no sites appear in this document. As you are aware we have met with the Neighbourhood Plan group to discuss potential options and infrastructure/flood risk. However, we have not been party to any potential site allocations yet. Careful location and design of development is required as parts of the town fall within SPZ1, 2 and 3 of a public water supply source.

Shifnal

The proposed development sites overlie sand and gravel deposits which in turn overlie the Permo-Triassic sandstone. These form a strategically important source of public water supply. The sites fall on the boundary between SPZ2/3. Groundwater levels are relatively shallow at 5 to10mbgl. It is therefore essential that appropriate land uses, drainage design and pollution prevention measures are adopted. This is particularly important for the employment site where a potentially wide range of activities may be proposed.

SHI004 - would involve the re-location of the existing industrial estate, consequently pre-existing land contamination issues would have to be considered.

Wem

The area is underlain by variable glacial deposits including permeable sands and gravels and shallow groundwater systems are known to exist. These will supply baseflow to the local watercourses. Appropriate drainage and pollution prevention measures would therefore be required and potential issues with the mains waste water infrastructure must be resolved prior to further development.

Shawbury

SHAW004 - The site overlies a mixed sequence of clays, silts, sands and gravels which in turn overlie the Permo-Triassic Sandstone (a principal aquifer). The groundwater is relatively shallow within the superficial deposits. There is the potential for contamination issues associated with adjacent land uses which should be considered prior to development. Surface water drainage should be carefully designed as there are a number of private water supplies in the immediate vicinity.

Land adj Shawbury Industrial Estate

The site overlies a mixed sequence of clays, silts, sands and gravels which in turn overlie the Permo-Triassic Sandstone (a principal aquifer). The groundwater is relatively shallow within the superficial deposits. There is the potential for contamination issues associated with adjacent land uses which should be considered prior to development. Appropriate pollution prevention measures and careful drainage design will be required as there are a number of private water supplies in the immediate vicinity.

Whixall cluster

As you are aware, there are issues with non mains drainage proliferation and shallow groundwater within the superficial deposits often making discharge to ground inappropriate. There are also many private water supplies in the area.

Market Drayton

Cont/d..

The proposed employment site is located on Helsby Sandstone (the upper part of the Permo-Triassic sandstone sequence). It is also partly located within SPZ3. There are also a number of other groundwater abstractions in the vicinity.

Housing sites (to the north of the town) - Shallow groundwater perched in the superficial deposits overlying the Mercia Mudstones has been previously encountered. This system appears to drain, in part, to the south to the River Tern.

Cheswardine and Childs Ercall are located on the Permo-Triassic sandstone (principle aquifer) within SPZ3 of a public water supply source. We would therefore not wish to encourage proliferation of non mains drainage. Hinstock is also located within a similar hydrogeological setting and the groundwater is noted as being relatively shallow. Given the size of the proposed development (50 to 100 houses) mains foul drainage should be provided. A careful designed surface water drainage design will also be required.

HOD001: Divisional Surveyors Sub Depot has potential contamination issues.

Colehurst, Tyrley, Woodseaves (Sutton Lane), Woodseaves (Sydnall Lane), Marchamley, Peplow and Wollerton – low development density however need to ensure appropriate drainage is provided as the villages are located on principal aquifer. Protection of private water supplies is also of importance as there appear to be a number present.

Moreton Say - low development density noted however there is the need to ensure appropriate drainage particularly as groundwater within the superficial deposits must be at a shallow depth.

Shrewsbury

Shrewsbury North East sites
'Battlefield sites'. The sites overlie till (mixture clays, silts, sands and gravels) which in turn overlie the Permo-Triassic sandstone. The depth to water table is variable. The majority of the sites appear to be greenfield with the exception of SHREW195 (former Tesco site).

SHREW 073 and 047 (Castle Walk) also appear to have potentially contaminative land uses (including landfill). This is acknowledged in the report. We have been formerly consulted regarding contaminated land issues associated with SHREW047.

Shrewsbury SE sites
In the eastern part of the SUE south there are a number landfill sites within or in close proximity to the site. This eastern part of the site is located in proximity to a potential private water supply.

Shrewsbury West sites

SHREW212/09 This site is located in proximity to a number of potential private water supplies.

SHREW038 – this is located adjacent to/within an old quarry. An unlicensed groundwater abstraction is recorded is noted on the records (possibly relating to the de-watering of the quarry) and a landfill site is located approximately 100m to the north. The depth to groundwater is likely to have been reduced as it is an old quarry and there

is the potential for contamination issues which will have to be adequately addressed via desk study and SI/remediation.

SHREW019 Landfill approximately 100m to the south.

North West SUE- The area overlies mixed drift deposits (clays, silts, sands and gravels) which in turn overlies the Permo-Triassic sandstone principal aquifer. The site falls within SPZ1/2/3 of a public water supply source. Consequently the hydrogeological setting is highly sensitive. Close control of land use will be required to ensure the protection of the water supply source and wider principal aquifer.

The proposals include a link road and business/employment land which fall within SPZ1, 2 and 3. These are potentially contaminating activities that could, without adequate control/design, have an adverse impact on the groundwater sources. We would recommend discussion with Severn Trent Water Ltd. It will be necessary to control in detail the proposed land use (employment proposals can cover a wide range of activities) in detail, foul and surface water drainage, foundation design, fuel supply etc. There are therefore a number of potential constraints on development in this area.

Nesscliffe Land West of Holyhead Road: (Sites NESS004 and NESS012) The sites are located on sands and gravels which in turn overlie the Permo-Triassic sandstone. Groundwater is relatively shallow. The sites are also located in SPZ3 of a public water supply source.

Bicton, Four Crosses area (part) and Montford Bridge
(Montford Parish) All located on Permo Triassic Sandstone – the majority within SPZ3 (except Bicton)

Hanwood- landfill located approximately 150m to the east of the site.
Possible shallow groundwater.

Merrington, Oldwoods and Walford Heath- mixed superficial deposits overlying the Permo-Triassic sandstone. The area to the SE of Merrington lies within a SPZ. There are a number of private supplies in the area.

Weston Lullingfields, Weston Wharf and Weston Common- overlie extensive drift deposits with a number of private supplies in the area.

<u>Whitchurch</u>

The majority of the proposed development sites overlie sands and gravels. In places the depth to groundwater appears to be relatively shallow. The sand and gravels will be important in providing baseflow to the local watercourses and can appear to support small scale commercial supplies in the area. The majority of the sites appear to be Greenfield. Although this would have to be confirmed.

WHIT021 lies in close proximity to a landfill site (located to the NE).

WHIT009 and ELR33 have landfills located to the south, however these are recorded as being inert and associated with the by-pass.

WHIT006 landfill located immediately adjacent to the site to the NW.

Community hubs – the area is underlain by extensive sand and gravel deposits and the groundwater is commonly very close to surface. There are numerous private water supplies in the area. Consequently discharge of drainage to ground is unlikely to be appropriate. Appropriate drainage is therefore required.

The allocated site in Prees Higher Heath has an industrial/commercial use presumably with fuel storage (transport depot). Contaminated land issues will therefore need to be considered (desk study and SI/remediation).

Oswestry

OSW033& OSW042- These sites have industrial/commercial uses, contaminated land issues will therefore need to be considered (desk study and SI/remediation).

OSW034/45 A landfill is located approx 100m to the North.

OSW029 is a brownfield site and contaminated land issues will therefore need to be considered (desk study and SI/remediation). SUE appears to be Greenfield however a desk study would be required to confirm that this is the case. Both sites are located on mixed drift overlying the Permo-Triassic sandstone within SPZ3.

Mention is made of provision of land for an extension to the Cemetery (to be agreed with Oswestry Town Council), detailed consideration of the groundwater conditions at the site would be required in order to determine whether this would be a suitable site in terms of protection of the groundwater environment.

Gobowen - There are a number of landfill recorded to the north of GB012

Kinnerley - the area is underlain by mixed drift deposits which are in turn underlain by the PT sandstone. Large parts of Knockin and Kinnerley fall within the SPZ of a public water supply borehole. The depth to groundwater in places is also relatively shallow. There are also a number of private supplies. Given the sensitive hydrogeological setting appropriate drainage solutions will be required.

Llanymynech & Pant – LLAN009 is in an area of industrial heritage, contaminated land issues will therefore need to be considered.

Ruyton XI Towns – located on mixed drift overlying the PT sandstone. Located within SPZ2/3 of a public water supply borehole. Shallow groundwater in places.

St Martins - Former mining area so there may be ground contamination/stability issues that will need to be addressed.

Whittington - Mixed drift deposits overlying the PT sandstone. Located within SPZ 3 of a public water supply borehole and shallow groundwater in places.

Park Hall, Hindford, Babbinswood, and Lower Frankton – located on Mixed drift overlying the PT sandstone and within SPZ 2/3 of a public water supply borehole. Shallow groundwater in places. Private water supplies are recorded in the area.

PARK001, 3, 4, 9 - Mixed drift deposits with shallow groundwater levels. There are known surface water drainage issues. Appropriate surface water and mains foul drainage would therefore be required. Given the former MOD activities in the area, contaminated land issues will need to be considered.

Cont/d..

Llanyblodwell, Porthywaen, Dolgoch, Llynclys and Brynmelyn- these areas are underlain by mixed drift deposits and parts overlie the Carboniferous Limestone and PT sandstone (principal aquifers). Private water supplies are recorded in the area. In the valley setting groundwater levels can also be shallow. In the valley setting groundwater levels can also be shallow.

Selattyn, Hengoed and Pant Glas – The village of Selattyn falls within the SPZ3 of a public water supply borehole.

Flood Risk

Shrewsbury

SHREW120/R- land adjacent the driving range. Climate change impacts on the River Severn will need to be considered to inform how much of the site is developable. We would question whether access to the site achievable from Dale Road or does it need to cross the Flood Zone 3/1% plus climate change flood extent. Site specific FRA will ultimately be required.

SHREW073 is in Flood Zone 2, although may be as a result of misalignment of the flood map, it is recommended that the developer undertakes some work through providing a topographical survey to verify the extent of the flood map.

We would also recommend that you seek the views of your Flood and Management team for comments as the lead local flood risk authority.

Pontesbury

PBY018/R – A Flood Risk Assessment is required to determine the extent of the floodplain in this location, as the site is partially within the floodplain. Floodplain in this location is not based on detailed flood modelling.

Bishops Castle Area

Site in bishop castle will need to consider a FRA to deal with the potential for localised fluvial and surface water flooding and to ensure that additional run-off is not discharged into the town. The site is not within a flood zone but that is because of the size of the catchment. The area adjacent to the ditch course is shown to be at risk of surface water flooding.

Bucknell site is on the edge of the floodplain, there is new information available from a developer's model, and we are looking to produce a flood model for this location, this will give a better understanding of flood risk.

Bridgnorth

All ok, although the employment site is on a watercourse that drains into the Mor Brook. Site specific FRA required. Development will need to be in accordance with the SFRA.

Church Stretton

Site CSTR014 will need a site specific FRA

Cont/d..

CSTR020 will need to manage surface water carefully, susceptible to surface water flooding and the risk of increasing flood risk elsewhere through being a steep sided catchment. We would recommend discussions with your Flood and Water Management team on the need for specific policies for the site in Church Stretton following the publishing of the Surface Water Management Plan.

Cleobury Mortimer

No issues but very careful consideration of run-off in Puddings Brook which has inadequate capacity to take any additional run-off from one of the proposed allocation sites.

Minsterley

We note Grove Farm has now been omitted.

Craven Arms

Level 2 SFRA is needed for this area, redevelopment of abattoir site and the employment area which lie within the River Onny floodplain. The information from the surface water management plan for Craven Arms should also be used to inform the level of flood risk on these sites, as this identifies flooding from small watercourses and surface water drainage.

Ludlow

We were provided information about the Linney Site in 2009 which used our river model for the River Teme which provides estimated levels for a range of different flood events, along with topographical information and historical flood levels. This evidence shows that the site is not within the high risk floodplain, and we would raise no objections to such an allocation. Although we haven't changed our position regarding this, we would make you aware that a number of residents have contacted us that they have information showing the site being affected by flooding, and have informed us that they are submitting this information to the Local Authority. We haven't seen this information, but are happy to provide further comments if necessary.

Market Drayton

Employment site - the flood map shows no modelled floodplain but the catchment is too small to have any associated floodplain with it. This needs to be assessed.

The residential development has floodplain crossing through (Main River Sych Brook through part of the site) which needs to be looked at.

Wem

ELR031 and WEM012 small parts of the site are affected by flooding, some investigation work is required to determine the extent of floodplain and to determine the amount of site that is developable.

Prees

PRE002, PRE011, PRE012 sites lie partially within the Strine Brook floodplain which is designated main river, a detailed flood risk assessment will be required to determine the extent of the floodplain and ensure all development is within flood zone 1.

Whitchurch

Housing - WHIT 033 - Flood Zones 2 and 3 affect part of the site. Staggs Book (ordinary watercourse - under the jurisdiction of your authority) adjacent to the site. Site specific FRA required.

Yours faithfully,

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End

Our ref: SV/2009/103911

Mr Andy Mortimer

Spatial Planning Policy Team

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SY2 6ND

Your ref: SAMDev Pre-Submission Draft

Date: 28 April 2014

I refer to your email of 17 March 2014 which notified us of your 'Pre-Submission Draft' for your Site Allocations and Management of Development Plan (SAMDev Plan).

Unfortunately we find it necessary to make a soundness objection on the majority of the strategic allocations in the Plan. This is on the basis that no evidence has been submitted as part of the statutory plan consultation to determine the risk of flooding and/or wastewater infrastructure. We have raised this previously and most recently in our email of 18 March 2014.

I refer to your email of 22 April 2014 with attachments which provided us with the Water Cycle Study and the updated draft flood risk assessment of sites. Given the timeframe of this late submission and other resource/workload issues, we are unfortunately not in a position to review this and to make comprehensive comments.

I refer to my email of 22 April 2014 which sought an extension in the consultation given the proposed introduction of additional information to enable us to review the findings etc, when formally submitted in a reasonable timeframe. This would also allow other parties to review the information, with reference to wider transparency and duty to co-operate for example, and enable more informed comments on the plan. However, I note your subsequent email confirming the statutory timescales for this part of the plan preparation and that you are not able to extend the deadline for comments.

I also refer to your email of 23 April 2014 including a copy of the final flood risk assessment of sites.

The following comments are therefore made on the pre-submission draft as submitted.

As an overview, the main reason for our objection is that it is not clear how or whether the flood risk Sequential Test (ST), as required by the National Planning Policy Framework (NPPF), has been undertaken. We recognise that you have/are still undertaking further work at this time, but we would question whether the plan has selected sites in accordance with the findings of this evidence base. It may be the case that the Plan will need to select some sites within the floodplain due to wider planning issues, but the Plan needs to document how this has been considered and this information is currently missing. In addition, the phasing implications do not appear to have been fully incorporated into the Plan in any kind of phasing of allocations, and the Plan does not make clear whether some of the allocations cannot be delivered and/or until certain actions are performed. We have made these requirements clear in our previous responses to the plan making process but they have not yet been incorporated/undertaken.

Strategic Environmental Assessment (SEA)/Sustainability Apprasial (SA) and Habitats Regulations Assessment (HRA)

Given our concerns and soundness objections on flood risk and waste water infrastructure as outlined above, we need to 'cross-reference' this aspect in our representations on the SEA/SA, and the HRA (which Natural England will lead on). Accordingly we would raise the SEA/SA as a Legal Compliance objection. For instance, depending on the outcome of further work and discussions with you on the flood risk and waste water infrastructure aspects this could have an impact on the HRA and SEA/SA. If for example there is not adequate phasing incorporated into the plan this could have a detrimental impact on water quality which could be a particular concern, particularly where it is also HRA related in those settlements within the Clun catchment. Or if for example the allocations are not referenced to key flooding issues such as access or flood risk reduction measures which in the absence of could create an unacceptable risk of flooding, which in turn would call into question the findings of the SEA/SA.

SA objectives relevant to the above include:

14. Protect and enhance Shropshire's water resources;
16. Reduce the risk of flooding to people, property and wildlife;

9. Reduce Shropshire's contribution to climate change;
10. Adapt to the impacts of climate change;

The SA asks the question will the plan "Seek to locate new development in areas of lowest possible flood risk? (the SFRA will need to inform this) and "Protect water..." (informed by the waste water infrastructure evidence base). There is some doubt on the answers to these questions.

Wastewater Infrastructure:

The site allocations and policy is currently considered unsound because:

i. There is some outstanding work in the Water Cycle Study (WCS) evidence base and issues/recommendations have not been fully translated into the SAMDev. At this time, the plan is not founded on a robust and credible evidence base.

ii. Clarification is required based on the evidence base, in line with the NPPF (March 2012) and NPPG, to ensure sites and policies are sound.

Background

As you are aware, our statement of common ground (2010) as agreed as part of the Core Strategy with reference to the Water Cycle Study of June 2010 required you to undertake further work for a number of settlement growth areas within Shropshire as part of the SAMDev process. To date this has not been completed. The statement of common ground was primarily agreed as a way to defer some of the waste water assessment matters to a later stage i.e. the SAMDev, given that the Core Strategy focused on the strategic growth within Shrewsbury and Oswestry only, which had sufficient clarity.

We have raised the need for further work on a number of occasions and I would refer you to comments made previously in our responses of 25 June 2010 in response to 'issues and options' and 20 July 2012 to your 'preferred options' consultation.

Our email of 30 May 2012 also provided you with an indication of where information needs to be revised/updated or carried out (those areas not covered in the original WCS report) based on an appropriate assessment process. This should include a review of Consents to achieve 'good status' in line with the Water Framework Directive (WFD). As you are aware we have provided you with WFD water body information to assist this aspect, along with other baseline data we hold.

Issues

The above concern is supported by the National Planning Policy Framework (NPPF).

Paragraph 158 of the NPPF requires you to use a "proportionate evidence base" and ensure that "the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

Paragraph 162 (***Infrastructure) states that:***

"Local planning authorities should work with other authorities and providers to:

assess the quality and capacity of infrastructure for transport, **water supply, wastewater** and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, **flood risk** and coastal change management, **and its ability to meet forecast demands**;…"

Habitats Regulations Assessment and Clun Catchment:

With regard to the Clun catchment and associated Habitats Directive consideration, due to the River Clun 'Special Area of Conservation' (SAC), we would draw attention to the fact that this aspect should be addressed in the Water Cycle Study with 'cross reference' to the **Habitat Regulations Assessment (HRA).**

At this time there is no HRA provided on your consultation website (just the 'stage 2', 2010 document for the adopted Core Strategy) and we assume that this is still being finalised, along with the WCS and SFRA evidence base.

I refer to paragraph 166 of the NPPF which states:

Local Plans may require a variety of other environmental assessments, including under the Habitats Regulations where there is a likely significant effect on a European wildlife site (which may not necessarily be within the same local authority area), Strategic Flood Risk Assessment and assessments of the physical constraints on land use. Wherever possible, assessments should share the same evidence base…"

We have previously raised with you the need to consider the Clun catchment which as well as WFD requirements, should be assessed in accordance with the Habitats Directive. As you are aware this requires your engagement with Natural England on emerging (more stringent) conservation targets i.e. to inform an appropriate policy approach. Natural England will lead on the HRA.

We have previously sent you and Natural England phosphate data and phosphate apportionment information for the Clun catchment to assist your discussions and final evidence base. You should also be party to the draft Nutrient Management Plan for the Clun. This should be used to inform your decision making and your policy should help deliver measures and options for improvement.

Further comments are made below in response to Policy S2.1 and S2.3.

Viability and deliverability

With regard to waste water infrastructure, we would expect the findings of the WCS to provide a reasonable degree of certainty to ensure viability and deliverability. This should include an assessment of any necessary alternatives and appropriate measures (looking at costs and phasing etc.) through a positive approach, to bring forward sustainable development.

I refer to paragraph 173 of the NPPF (***Ensuring viability and deliverability).***

This states that…"**Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable**…."

A WCS should help assess whether water infrastructure can be funded and built at the pace needed to support the proposed development. It could be questioned how the deliverability of infrastructure will be met if the costing are not part of this process.

The National Planning Practice Guidance (NPPG), March 2014, poses the question - **What evidence is needed to support the policies in a Local Plan?** The guidance states that...

"Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)".

In the case of wastewater infrastructure we would advise that you seek a reasonable degree of certainty on what will be provided and where, for example in addressing environmental capacity shortfall, and when such infrastructure will be provided, looking at the 'needs and costs' (what and how much).

We have previously advised that the plan making process should consider developer contributions towards accelerating waste water improvement schemes. Our understanding is that this can be secured as part of planning contributions from developers.

Specific phasing and timing considerations for the strategic site allocation areas do not seem to have been identified yet, presumably as the evidence is not yet available. We would recommend that the policy makes reference to any phasing and timing constraints that may be present and ensure that you are satisfied with the ability for sufficient growth to come forward in the short, medium and longer term. This would be based on confirmation from Utility Companies including Severn Trent Water and Welsh Water, to ensure the appropriate infrastructure will be in place/accommodated prior to sites being built.

As set out in the NPPG, the evidence should be... "**focused tightly on supporting and justifying the particular policies in the Local Plan**. Evidence of **cooperation** and considering different options for meeting development needs will be key for this process. **The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively**. (This has unfortunately not been the case). It should also be kept up-to-date".

This will include phasing and timescales considerations to ensure implementation, deliverability, as well as sufficient flexibility. Some of the policy text points to this approach but at this time in the absence of evidence base, it is difficult to

demonstrate that the infrastructure is deliverable and the SAMDev policy is not based on a sufficiently robust evidence base.

Strategic Flood Risk Assessment (SFRA):

Similar to the above, there is a need to provide a proportionate evidence base to ensure flood risk has been fully taken into account, within a Strategic Flood Risk Assessment, as part of the plan making process. It should inform site allocations for residential and employment, including waste sites; and assist mineral sites.

Background

We acknowledged your comments, in our response of 25 June 2010 that "a SFRA update will be undertaken including an assessment of all flood risks".

We reiterated our views on the need for a SFRA update in our response of 20 July 2012 to 'preferred options' and further clarified that:

Depending on what sites are brought forward (at the next stage) and the location, level of detail in the SFRA etc, risk, nature of the watercourse, existing modelling etc we stated that there may be a need to produce some modelling or assessment to identify/refine the risk to a site and inform developable areas etc. As confirmed in our response to the conclusions of the WCS final draft, 'there will be some watercourses that have not been subject to even the broad flood zone 3 or 2 type modelling, which whilst showing up as lower risk (flood zone 1) area may in fact be at risk. There may be a need to undertake further modelling or some other way of precautionary assessment to assess sites…'

In November 2012 our Flood Maps were significantly updated and we advised you to consider these in your SFRA update, to help inform your site allocation process.

We also convened a meeting on 30 May 2013 to help progress the SFRA update and reiterate requirements etc.

Further to our meeting we advised that "*the SFRA update should consider our latest (November 2012) flood zone map update compared to the existing flood risk evidence base as the best available data at this time. This is in addition to the previous recommendation to consider those 'ordinary watercourses' that are not modelled and/or have no floodplain associated with them. We discussed that in some areas the floodplain as shown on our maps has become more extensive but in other areas it may have been reduced or removed. This has implications for sites previously proposed to be allocated and those that had been previously discounted. At the meeting we suggested you provide a 'clarification statement' to confirm the flood risk mapping changes and impacts for certain settlements to inform your decision making; and inclusion of appropriate text within the settlement strategy documents to explain the flood risk impacts (data)/changes for sites, to make it transparent*".

Issues

The above request for information is supported by the NPPF and NPPG to help avoid inappropriate development in areas at risk of flooding.

Paragraph 100 states that... “Local Plans should be supported by Strategic Flood Risk Assessment and...Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

● *applying the Sequential Test;*
● *if necessary, applying the Exception Test;*
● *safeguarding land from development that is required for current and future flood management;*
● *using opportunities offered by new development to reduce the causes and impacts of flooding; and*
● *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations”.*

As set out in the NPPF, the SFRA will provide the basis for applying the Sequential Test. Further advice on applying the Sequential Test is provided in the NPPG including diagram 1 and 2. We have also previously pointed you to other Local Planning Authorities in our area who have produced such documents.

The NPPG states that “For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage)...”

We would recommend a Sequential Test is carried out to clarify all of the site allocations. This will help identify priority sites for development and sequential approach for those that may be at higher risk of flooding.

Examples:

There are some areas of land proposed for allocation which are at risk of flooding. For example, in Church Stretton **ELR078 (Church Stretton**) is within Flood Zone 3 and 2. Site **CSTR018** is within Flood Zone 2.

Some exceptions are where we have had detailed modelling assessment from a consultant on behalf of a client proposing land for allocation. These include:

PBY018/29 Pontesbury - We have commented on the preliminary modelling submitted by Peter Brett Associates for this site in 2013 and provided some recommendations. We confirmed that we had no issues with the hydrology/modelling used and accept that, given the topography, the majority of the land will be developable. However a detailed FRA would have to be submitted with a planning application and include appropriate blockage scenarios on the culvert under the old railway line in order to show areas of the site which are not developable (which will be in the north west of the site) and to inform safe development in terms of finished floor levels, safe access/egress.

ELL003 (a&b) Land South of Ellesmere – Please see email dated 15 January 2014 sent to Maria Cantwell at Shropshire Council.

We stated that "The proposal (based around the 'draft' masterplan) is to open up the 1.2km watercourse to alter the existing floodplain outline and adjust areas to show flood storage betterment can be provided. This would enable some development footprint area, but as a minimum show the site can be developed in principle, subject to a detailed FRA...If the 1.2 km of culvert is removed, the control structures would need to be engineered - the report provided a plan showing how the flood storage could, in principle, be readily provided...The scheme also shows significant improvement and re-creation of a river corridor and offers potential environmental benefits, including improvement in line with Water Framework Directive (WFD) objectives.

We also discussed the option of removing the downstream culvert (third party land) on the Newnes Brook (Main River). This could provide additional flood risk reduction and additional benefits including for WFD, asset maintenance etc. However, it would involve assessment of the flood risk impacts of this option on both the development site and land elsewhere i.e. to inform the need for any compensation for potential loss of land value etc.

We advised that the policy text should highlight the need for a detailed FRA to demonstrate developable areas, to inform the final masterplan /development proposals; and include flood storage betterment utilising the Tetchill brook corridor, maximising wider environmental benefits through the improvement and re-creation of a river corridor.

Further to our request for an assessment of sites within Flood Zone 1, including where ordinary watercourses are present, we would raise the following examples to indicate this issue. This is of course not an exhaustive list:

SHREW212 Land West of Longden Road

This is land is within Flood Zone 1 on our Flood Map but has an ordinary watercourse running through it. This will not have been modelled as part our National Flood Mapping (J Flow) as the catchment would be too small. However this is an area known to flood on its eastern edge and on to the Longden Road and parts of

Mercian Close. This will be known to Shropshire Council as Ringway currently remove debris from a road culvert as this is near their depot.

OSW029 Former Oswestry Leisure Centre

This land is designated flood zone 1, but does have an ordinary watercourse within it. We do not know of any flooding issues, but your SFRA should be assessing the flood risk from this ordinary watercourse.

MIN007 Callow Lane Minsterley

There are known flooding issues downstream of the site. Whilst the site is in Flood Zone 1 there is an unmodelled ordinary watercourse which needs consideration.

We have the following comments on other parts of the plan:

Policy MD5: Sites for Sand and Gravel Working

Quarrying activities have the potential to change the groundwater (hydro-geology) and surface water (hydrology) regimes as a result of removal of materials, de-watering activities, restoration activities etc. It is essential that these aspects are fully considered at an early stage. At this time, the policy does not reflect our previous advice and recommendations as set out in our letter of 20 July 2012.

The development guidelines for sites should include:

"The effects of the development **on hydrogeology** and hydrology will be a key consideration. A full hydro-geological risk assessment will be required in order to assess the potential impacts of the proposal on environmental features supported by groundwater, for example, wetlands, watercourses, ponds or existing water supplies (wells, springs and boreholes). The assessment must consider any potential deterioration in both groundwater quantity and quality and will require the submission of a conceptual model to allow identification of potential adverse impacts arising from the proposals. Identification of whether potential impacts are deemed acceptable and/or can be appropriately managed through avoidance or mitigation measures".

Applications will need to be supported by a 'water features survey' to identify environmental features and may require the installation of monitoring infrastructure and implementation of a long term monitoring programme for the water environment (potentially including off site features).

A programme of groundwater level monitoring should commence well in advance of the submission of a planning application in order to inform a hydrogeological risk assessment. A Scheme of Working based upon the HRA and groundwater level monitoring results should be submitted with any planning application

Further Note - At present, abstraction for quarry de-watering does not require an abstraction licence. We expect Government to ask us to start licensing quarry de-watering activities in the near future. There is no guarantee that a licence will be granted for some sites.

Such as decision will ultimately be based upon site specific circumstances such a proximity to sensitive sites such as watercourses or SSSIs, within groundwater units that are subject to unsustainable abstraction (closed units) etc. Many of the proposed sites are located adjacent to watercourses and Wood Lane is in very close proximity to a closed groundwater unit.

Your SA states ....The assessment shows that policy MD5 is likely to have a positive effect on the sustainability objectives of; promoting a strong and sustainable economy; encouraging inward investment and supporting existing businesses; protecting Shropshire's landscapes, townscapes, historic environment, bio- and geo-diversity, air, soil and water quality and resources and reducing flooding. However, in the absence of the suggested policy text above these objectives may not be fully met.

MD8 – Infrastructure Provision:

As recommended previously, Hydro Electric Power schemes should include 'water resources' and 'ecology' as relevant impacts (point 4 iii.). These should be added to the policy text.

We have concerns on the policy approach which states that "particular attention will also be paid to impacts on water quality in the local river catchment and impacts on the sewerage network". These are matters that should be made clear in the WCS evidence base, rather than left to the planning application stage. If constraints and issues effecting deliverability were better understood then the policy could cross reference to these and the policy could have a more specific control or delivery use.

The explanation (4.69) just confirms that "critical infrastructure such as those relating to waste water management may require development to adopt specific design measures or phasing". That basic statement is correct, but the evidence base should highlight where these problems are likely to be encountered, inform what 'measures' could be done and when (for example, measures or improvements might become available/be undertaken); and/or indicate whether development might not be acceptable until such a time an option is carried out, this could be accelerated or development could be phased. The policy is not informed by the evidence base and is worded as a rather reactive measure.

MD13 Tourism facilities:

We previously confirmed that we would be happy to discuss any options/proposals or policy guidance for river based marina systems.

From a flood risk perspective we welcome guidance on the 'managed retreat' of any static caravans, chalets and cabins in unsustainable locations i.e. that could be relocated from areas at flood risk. We note that a policy line has been included (point 9) to ensure consideration of the relocation of existing caravans, chalets and park homes to land outside of the floodplain, which we support.

MD14 Waste Management Facilities:

We welcome the inclusion of comments as suggested in our response of 20 July 2012, including matters relating to the potential adverse effects (in point 1, i.) and criteria for in vessel composting and AD facilities (point 2, i.).

This section could state that "any waste or digestate storage tanks shall be above ground, or where this is not feasible or practicable, proposals should demonstrate that tank bases are an appropriate distance above the seasonal water table. (This is in line with our GP3 policy and is a key issue on these applications to ensure no impact on controlled waters). AD installations should provide effective secondary containment including bunding".

As suggested previously, it would also be useful to include some criteria for intensive poultry applications which are a key issue in Shropshire. For example you could join up the planning and permitting issues and criteria based assessments for emissions such as 'air quality' i.e. need for ammonia screening etc. This is a particular issue where such proposals are within proximity of a 'designated nature conservation site' and effects your decision making as competent authority under HRA, as follows:

The first stage of the ammonia screening assessment identifies if there are any European sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites) within 10km, SSSI's with 5km and other conservation sites within 2km of the site application. Similar to waste applications, there are overlaps with regulation and therefore a need for discussion with your Public Protection team. The intensive poultry detail might fall within Policy MD12, to protect the natural environment including those designated sites, rather than in the waste section.

We also welcome the explanatory text (section 4.146) based on our previous advice, which draws attention to the need for an appropriate level of detail (assessment) at the planning application stage to ensure the location is appropriate, where an Environmental Permit is required to 'control' the development, with cross reference to those regulatory constraints in so far as they influence material planning issues. This could give examples of odour and noise (as the key emissions).

MD15 – Landfill

We welcome the comments which point towards compliance with water management and groundwater resource protection (point 2 i) as highlighted in the explanatory text (section 4.148) including national policy guidance on landfill.

However, Point 2 ii suggests that 'need' could perhaps override 'environmental impacts'. We would raise objection on proposals that might result in significant adverse environmental impacts particularly where contrary to other legislative policy etc. We would suggest that this part of the policy could be reworded to state "Demonstrate to the satisfaction of the WPA that there is a need for the facility".

We would point out that in some case there might not be appropriate mitigation measures available to avoid and reduce adverse impact.

MD17 - Managing the development and operation of mineral sites

Part 2 of this policy could include a reference to "contributing to Water Framework Directive objectives" i.e. to achieve good ecological status by 2027; and provide multi-functionality in after use schemes including environmental enhancements; for example flood management and biodiversity benefits from wet washland attenuation as part of a mineral sites restoration plan.

S2. Area wide policies and other allocations

Further to the comments above in relation to the WCS and HRA we note the inclusion of a specific policy reference to the River Clun SAC within Bishops Castle and Craven Arms (western part of the Craven Arms area is in the river Clun catchment).

The consultation does not appear to be supported by a final HRA and in the absence of this, and the WCS, it is unclear how the policy has been fully informed by the evidence. Whilst we would expect Natural England to lead on the HRA we have an interest in this document given its inter-relationships, particularly to the likely potential significant impacts upon the Clun SAC from wastewater etc.

As you are aware, there is a draft Clun Nutrient Management Plan and this has involved discussion with the Utility Company (Severn Trent Water Limited) on potential options and measures that could be undertaken at waste water works in the catchment to help achieve the water quality conservation targets. This information is not mentioned.

At present, Policy S2.3 states that any "development in the River Clun catchment, including in the town of Bishops Castle, clearly demonstrates that it will not adversely affect the integrity of the SAC". It mentions "incorporation of measures" but it is unclear what these measures are and where this detail has come from. The policy does not include specific reference to those measures contained within the draft

Clun Nutrient Management Plan (NMP), which is touched upon in the explanatory text. We would expect these to be more effectively translated into policy, where relevant, informed by the WCS evidence base.

Our most preferred sustainable solution would be to identify improvements to the mains foul sewerage system to help address any capacity issues and point source impacts, but we appreciate that other diffuse impacts are a significant issue – the main contributory source in the Clun is land management. Some other catchment management measure(s), funded by developer contributions, could be considered to help deliver effective, sustainable solutions. We note that there is a reference in Policy S2.1 for "All development in Bishop's Castle must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and any agreed management strategy for the river catchment".

The SAMDev should have regard to and utilise the NMP to identify and help deliver some of the measures. Overall this policy needs to be more specific.

Note - Other settlement policy may need further revisions subject to the evidence base.

Conclusion

We have soundness objections on flood risk and waste water infrastructure which relate to the undertaking of a SFRA, the Sequential Test – to inform the evidence base and phasing of strategic allocations. These require further work and are likely to require substantial alterations to the Plan to address matters. We would welcome discussions with you on these matters to assist in making the Plan a sound document. We have raised a legal compliance objection on the SA/SEA and HRA at this stage given that these matters inter-relate.

We have some recommendations for improving policies and wording in the Plan which we have made suggestions for. We would anticipate that these could be undertaken as Minor Modifications.

Please do not hesitate to contact us if you have any queries. We look forward to working with you to help resolve the issues with the Plan.

Yours faithfully,

Mark Davies

Planning Specialist

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