PLANNING COMMITTEE 11 NOVEMBER 2026

Item 5. Written representation from the public

The Town Clerk has received one written representation, from Marcus Purvis, relating to Item 7 (Land South of Wilsom Farm). It comprises the comment below and the appended presentation.

Mr Purvis requests:

> "1. That the Town Council keeps its objection while the Environment Agency still objects. Its letter of 3 November recommends refusal.
>
> "2. That if EHDC does not propose to refuse while the EA objection stands, it consults the Secretary of State first, as the 2024 Consultation Direction requires for major development in a flood risk area."

EHDC-26-0082-FUL · WILSOM ROAD, ALTON

What the applicant's own evidence shows

Revised plans (20 Oct 2026) for two industrial units, run 24/7, beside the Caker Stream. Prepared by local residents from the documents on the planning file.

Evidence as at 4 November 2026

Over 200 comments are on the planning file. Comments close 24 November 2026 (extended from 10 November).



Applicant's image, CGI 01 P01, Oct 2026

WHAT RESIDENTS FOUND

Six claims the evidence does not support

THEY SAY	WHAT THE EVIDENCE SHOWS
"no floodwater modelled along … proposed access road"	**The EA found the access and bridge are in the functional floodplain**
Upstream, "minimal change"	**Blocked, their own table puts water up to 884 mm higher (our calc.)**
The bridge "is unchanged"	**Their Sept bridge drawing is preliminary, drawn to 24% not 36%**
Groundwater "~97 mAOD"	**Their own boreholes found water at 97.75 to 99 m**
"do not anticipate amenity implications from 24/7 operation"	**Their noise study assesses nothing from 10pm to 6am**
Footways "vary in width between 1.5 and 2m"	**Residents measured the footway at 65 cm to 137 cm**

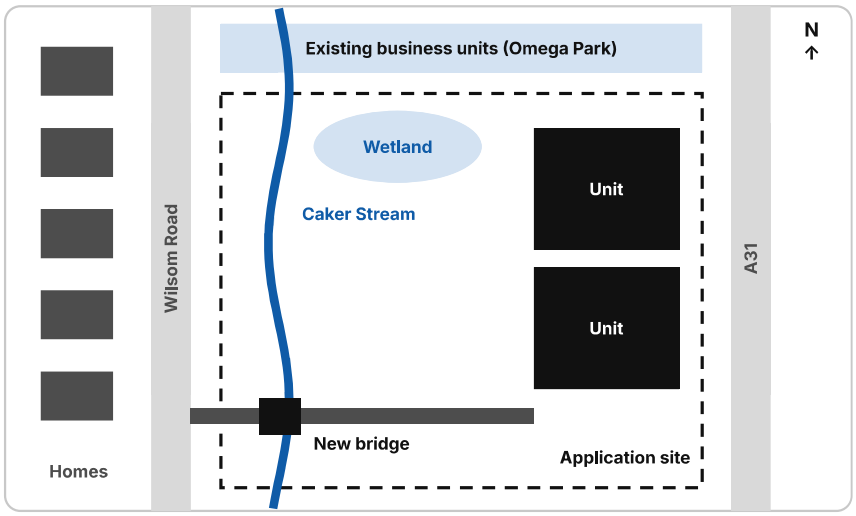
STILL OPEN

None of these points is resolved on the planning file. Slide 13 links them to policy.

Sources: given on each of the slides that follow.

WHERE IT IS

Homes face the site across Wilsom Road



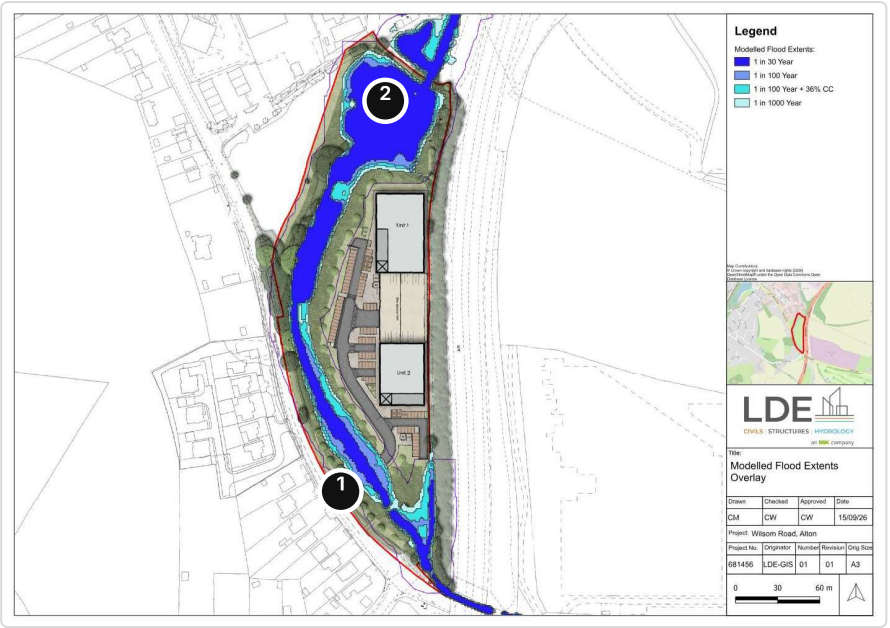
What's proposed

- Two units, 3,716 m² (was 4,956 m²)
- Access from Wilsom Road over a new bridge
- 87 parking spaces
- 54 lorry movements a day (applicant's worst case, two-way)
- Land allocated for employment in 2016

Schematic, not to scale. Sources: UMC Site Layout 0601 P08 and Site Sections 0602; Arrow cover letter APL-452, 16 Oct 2026; Apex Transport Note TN01, 29 Sep 2026, para 2.5.6; Allocations Plan 2016, EMP2.

FLOOD: THEIR MAP

Access in the floodplain, says EA



1. Access from Wilsom Road
2. Northern wetland

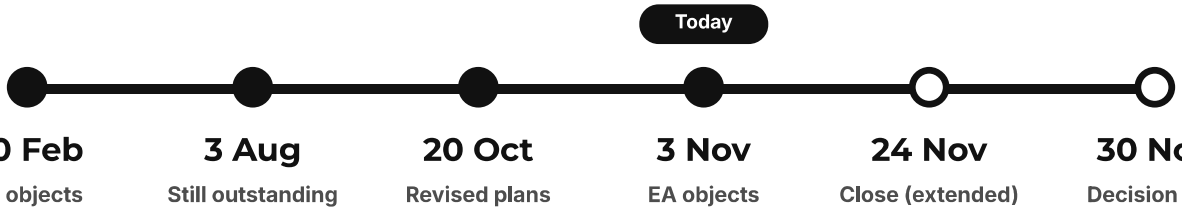
They say no floodwater is modelled along the access road. The EA found the access route and bridge are in the functional floodplain.

UNRESOLVED
Will the EA objection be resolved before a decision?

Sources: RSK LDE Technical Note 681456-R2(0), 22 Sep 2026, p3 and Appendix B (map 15/09/26, markers added); EA letter HA/2026/127457/01-L01, 20 Feb 2026, p1.

FLOOD: THE REGULATOR

The flood regulator still objects to the revised plans



They say their flows "have been reviewed". On 3 Nov the EA objected again: it cannot review their model without an up-to-date hydrology study, and their flood storage compensation is inadequate.

UNRESOLVED

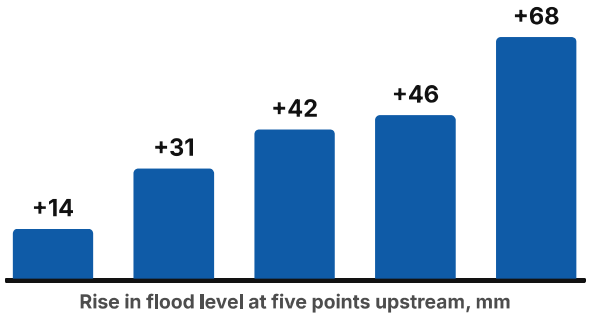
Will the EA objection be resolved before a decision?

Sources: EA letters HA/2026/127457/01-L01 (20 Feb 2026, p2), HA-2026-127457/02 (3 Aug 2026) and HA-2026-127457/03 (3 Nov 2026, pp1 to 3); RSK letter 681456-R1(2), 27 Mar 2026, p1; EHDC planning portal.

FLOOD: THE BRIDGE

A blocked bridge raises water up to 884 mm

They say: "minimal change". Their own tables say otherwise.



Rise in flood level at five points upstream, mm

+884 mm

if 80% blocked, against the level without the scheme

Our calculation from their Table 2 (their text says 800 mm)

UNRESOLVED

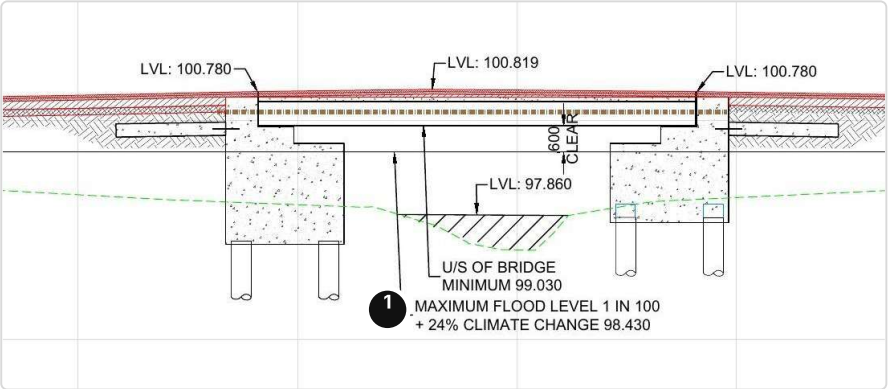
Has the effect of a blocked bridge upstream been shown acceptable?

Source: RSK (LDE) letter to the EA, ref 681456-R1(2), 27 Mar 2026, Tables 1 and 2. Bars: design flood (1 in 100 year plus 36%), bridge clear. Rises calculated from the tables.

FLOOD: THE BRIDGE DESIGN

Their latest bridge drawing is still preliminary

They say: "The proposed bridge crossing is unchanged".



1. **Drawn to 1 in 100 + 24%**
2. **EA asked for 36%**
3. **Marked "Preliminary"**

Blocked 80%, their model puts water just upstream at 99.46 m, above the 99.03 m underside (our calc.). RSK accepts it "exceeds the soffit level".

UNRESOLVED

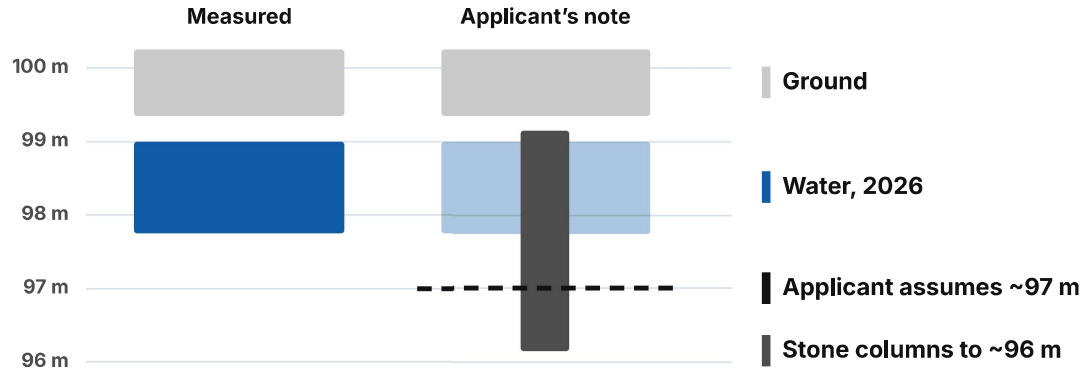
Has a full bridge design been tested at 36% and when blocked?

Sources: Burrows Graham bridge section 00202 P04, 23 Sep 2026 (drainage note P05, p14; image from P02, same levels; marker added); RSK 681456-R1(2) Table 2 and p8; RSK TN 681456-R2(0) p1.

GROUNDWATER

Their boreholes found water up to 2 m higher

They say groundwater is "~97 mAOD" and "The site is impermeable".



UNRESOLVED

Has groundwater been assessed against the 2026 readings?

Sources: Soils Ltd MIR Rev 1.2, Table 2.7 and logs WS1, WS4, WS7; WHS Technical Note v3.0, 15 Oct 2026, pp2 to 3. Metres above sea level, calculated from the logs. The boreholes are in shallow deposits.

DRAINAGE

The outlet sits below a modelled flood level

They say: "MANHOLE OUTLET TO HAVE A FLAP VALVE" (their revised drainage drawing)

Their revised drawing puts the outfall at 97.15 m. A flood level of about 97.65 m from their own model is labelled nearby, half a metre higher. In February the county flood authority raised "concerns with the discharge point being at a lower level than the expected water level", asked for maximum flood levels "so the risk of a surcharged outfall can be assessed", and, on the information then provided, did not consider the drainage compliant with the National SuDS Standards. No response from it on the revised drainage is on the planning file.

UNRESOLVED

Has the flood authority assessed the revised drainage?

Sources: BGL Drainage Strategy Technical Note P05, drawing (PDF p13); HCC LLFA response SWM/2026/0062, 26 Feb 2026, p2.



THEIR PICTURE

Their picture leaves out the HGVs

1. **No lorries visible**
2. **No forklifts visible**
3. **Planting shown already mature**

UNRESOLVED

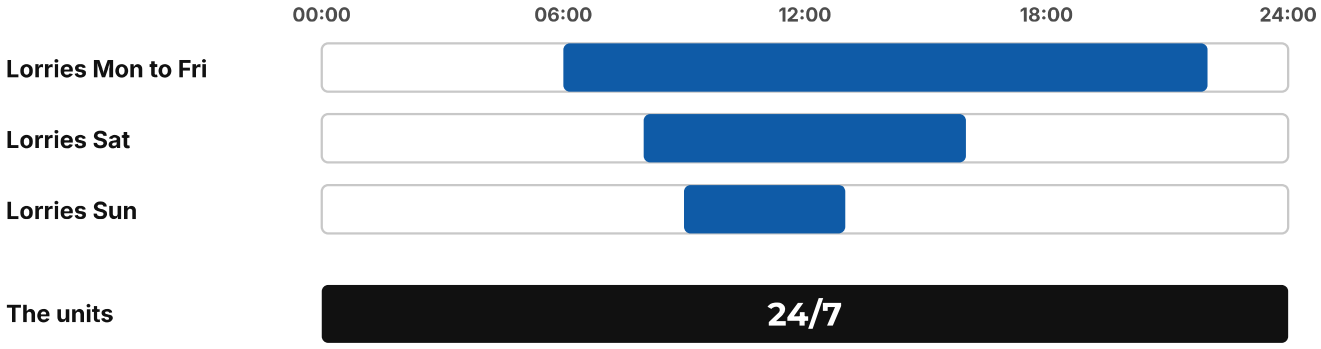
Has the visual impact been judged with 54 HGV movements a day?

Sources: applicant's CGI 01 P01, UMC drawing 0002, 15 Oct 2026 (markers added); Apex Transport Note TN01, para 2.5.6 (two-way, B8 worst case).

OPERATING HOURS

24/7 operation; nothing assessed from 10pm to 6am

They say: "We therefore do not anticipate amenity implications from 24/7 operation of such a use."



UNRESOLVED

What protects the homes opposite from 24/7 operation at night?

Sources: Arrow Planning email to EHDC, "Response to EHO" (on the planning file): HGV windows offered as a condition; "The proposed operating hours for the units are 24/7." Auricl Noise Impact Assessment v04, 16 Sep 2026, pp8 to 11.

ROADS AND PAVEMENTS

The footway narrows to 65 cm

Their own safety assessment says the footways "vary in width between 1.5 and 2m".

1.8 m

HCC's figure, from a "high-level review"

Not 1.8 m

residents measured 65 cm to 137 cm along Wilsom Road, with photos

42.7

mph: 85th percentile speed southbound on a 40 mph road (their survey)



UNRESOLVED

What is the actual footway width along the walking route?

Sources: HCC Highways 059449, 20 Mar 2026, p1; residents' measurements and photos, 2 Mar 2026 (planning file; photo shown); AKT Road Safety Risk Assessment, 14 Apr 2026, para 3.12; Apex TA01, Table 2-1.

FOR A COUNCIL RESPONSE

Points a council response could address

Open points on the planning file:

1	**The EA found the access is in the functional floodplain**
2	**A blocked bridge raises water up to 884 mm (our calc. from their figures)**
3	**Their Sept bridge drawing is preliminary, drawn to 24% not 36%**
4	**Their boreholes show water up to 2 m higher than assumed (our calc.)**
5	**On the old plans, the flood authority did not consider drainage compliant**
6	**Residents measured the footway at 65 cm to 137 cm, not 1.8 m**

Policies engaged: CP25 flood risk (points 1, 2, 3, 5); EMP2(b) and CP31 roads (point 6).

Prepared by local residents · wilsomroadplanning.co.uk

Sources: as given on each slide. Calculations from the applicant's figures are labelled as ours.