



Inspector David Vickery,
Planning Inspectorate
Cc Annette Feeney PO

20 October 2013

Dear Inspector Vickery,

**Joint Core Strategy Broadland District Council
Flood Risk Assessments re the North East Growth Triangle**

This requests you not to proceed with this JCS as it affects the NEG T because of ineffective Flood Risk Assessments as described below. This letter is lengthy but the bulk of it is evidence supporting the conclusions on page 5.

Explanation of Reasons for Request:

The consequences of ineffective management of flood risk are serious and you will see from reference to the correspondence in this report that this is the case in this area and for which a proper Strategic Flood Risk Assessment is still awaited. Concerns about assessing flood risk in this area has involved every department of both local and national government because fundamental aspects of policies and guidance issued for understanding and managing flood risk has been ignored.

Essentially this centres on the importance of heeding local anecdotal evidence and utilizing local knowledge in order to understand the risks which is the key requirement. Listening is key to understanding and effective management requires an iterative approach involving people who might know the problems but not the answers, whereas the experts who might have the answers do not understand the problems.

There is no evidence at all of local anecdotal evidence being heeded by the Local Authority as called for by policies. This singular but fundamental failure to comply with this basic tenet has been reported exhaustively right up to Prime Minister level but to no avail. It has to be emphasized that the strategies, policies procedures and codes of practice deriving from successive Acts of parliament are perfectly fit for purpose but the letter and spirit of those requirements has not been complied with.

If the conclusions you reach are the same as mine then please act in the public interest in order to effect remedial action, because halting this JCS will

do immeasurably more than what I have been able to achieve over several years of arduous effort. Conversely, approving this JCS for the North East Growth Triangle will only perpetuate what seems to be a calculated laissez-faire approach to Development and Flood Risk policies and toleration of ignorance of such risk by those whom we consider to have the primary obligation to comply. One has to study the facts reported below in order to realize that these are not sweeping statements.

Until as recently as 19 September 2013, it became apparent that the Area Planning Manager for Broadland District Council NEG T did not seem to be aware of the responsibilities placed on the Local Authority regarding the Flood and Water Management Act 2010. But then what I witnessed a week later was even more alarming when at the Broadland DC Planning Committee meeting, that was convened to consider the Beyond Green (NS&OC) Application, which is still a premature submission pending the outcome of this JCS, he admitted that not only did he know next to nothing about flood risk, but furthermore he doubted if any of the other planners did either.

One has to understand this admission in the context of what has been going on regarding these flood risk assessments: I have questioned the technical credibility of these assessments but most importantly the process by which Flood Risk Assessments are prepared and approved. These points have been repeatedly raised this with every agency or authority involved in flood risk, right up to and including the Prime Minister and Deputy Prime Minister but to no avail. This has resulted in me applying a formal complaint against the CEO of Broadland DC.

I do not need to describe the seriousness of flooding to existing households but I need to explain to you the significance of this in relation to this NEG T JCS.

For economy of effort and evidence for the record, I am attaching correspondence selected from an extensive pack that explains the current situation as it pertains to development and flood risk in this area together with a background summary and history leading up to this request to stop this NEG T JCS.

You will see that the formal complaint against the CEO of Broadland DC relates to non-compliance with the letter and spirit of policies that derive from the Flood and Water Management Act of 2010 and the previous Act, that as far as PPS25 Development and Flood Risk is concerned, did not change but has been incorporated in the current policies such as the Defra publication entitled: 'Understanding the risks, empowering communities, building resilience' - describing the national flood and coastal erosion risk management strategy for England pursuant to section 7 of this Flood and Water Management Act 2010. These principles as they affect other sections of the Act are the same but most important is the fact that PPS25 Development and Flood Risk December 2006 remains in place.

I will not go too far into technical reasons for questioning these flood risk

assessments in this area though of course I have done so as documentation will show. That said, I only received the Beyond Green FRA after the Planning Committee met on 25 September 2013 to approve the North Sprowston & Old Catton application. I had studied what had been submitted in their first premature planning application and found the assessment to be seriously flawed as I commented on in my representation to Broadland DC at the time, but my comments were not well advertised for the public to consider. This is an important omission in terms of helping residents to understand the risks in relation to the development proposed.

The Environment Agency halted this Beyond Green FRA on 14 December last year so I took some comfort from that but the reason for lifting this holding objection did not come to my attention until very recently. I think it is imperative that the public see the Environment Agency's evaluation of the developer's FRA because this too needs to be evaluated in the light of crucial local knowledge as we have proved conclusively to be the case in the past over the Sprowston Park & Ride repeated flooding debacle and the Home Farm drainage circumstances. This is what prompted my proactive approach to the Beyond Green proposed development described in Section 4.

There has been a remarkable degree of failure to heed the substantive anecdotal evidence of flooding and flood risk that should not have been ignored, especially when it has been protested as strongly as it has been but never ever once being questioned. In retrospect, a reason for this failure to heed local knowledge is because the Local Authority admit to not understanding the subject of flood risk despite the fact that the burden of responsibility for compliance to manage it rests on them. In which case their competence to comply with the legal obligations, codes of practice or policies and procedures, needs not just questioning but cannot be accepted. Failure to comply with policies determined under an Act of Parliament to protect people and their homes cannot be an option and where requests for local anecdotal evidence to be discussed has been declined, then those FRA's should not be approved. Proving the Environment Agency and local authorities to be to be wrong gives no satisfaction. We have repeatedly sought assurance against the adverse effects of flooding through compliance with the appropriate policies complied with but to no avail.

Contents index: From selected documents and correspondence these sections describe failings in the management of flood risk and the inevitable conclusions are drawn.

Section 1: Description of Formal Complaint against the CEO of Broadland DC and the circumstances precipitating it. The attachments referred are sections 2, 3,4 and 5.- see below.

Section 2. page 10. This is a statement read out to the Broadland District Council Planning Committee convened to consider the Beyond Green Planning Application for North Sprowston & Old Catton on 25 September 2013 and is self-explanatory.

Section 3: page 14. is a letter to all Broadland District Councillors dated 20 September 2013 re Flood Risk in North Sprowston. This letter was written to ensure that all Councillors who might not be aware of the fact, are not just the ultimate authority for approving Flood Risk Assessments but in reality are the only authority actually approving these risk assessments because that is not something that the Environment Agency accepts responsibility for, to quote: "we do not approve as such. " It is suspected that Councillors were not aware of their sole responsibility because the original FRA referred to in that letter was originally decided under Referred Matters so the respective planning application approved by them had had the respective FRA approved by Officers contrary to what DCLG assumed. What is clear now is that they are the only approving body because Norfolk County Council does not become the statutory Lead Local Authority for flood risk assessment and prevention until 2014.

Section 4: page 20. These are notes on a meeting and site visit with Beyond Green personnel on 17 February 2011 to discuss Flood Risk in North Sprowston. This was a proactive initiative to the developers to communicate to them detailed evidence of propensity of flooding in the area generally, so it was very disappointing that Beyond Green did not reciprocate and discuss the FRA as I understood and hoped would be the case.

Section 5: page 29. Letter dated 23 January 2012 to Prime Minister and Deputy Prime Minister regarding developments going ahead without proper FRA compliance. This appeal was made after several years of trying to get all of the authorities concerned to listen to the experience residents regarding flooding and implement PPS25 Development and Flood Risk, December 2006. As expected the response was delegated but has not resulted in straightforward compliance of policies, instead the culture of buck-passing continues as subsequent correspondence shows.

Section 6: page 30. Letter to Ria Morodore of Defra dated 23 October 2012 entitled Flood Risk Sprowston and Broadland Norfolk. This reports buck-passing by chapter and verse and expresses resistance to the suggestion by Defra that I make a formal complaint against the Local Authority. A very unsatisfactory situation is described of failing to confront non-compliance of adequate procedure and using the LGO to park the problem.

Section 7: page 34. Letter dated 16 December 2012 to PM and DPM being in effect a situation report, again pointing out where failure lies and seeking to establish accountability for the proper implementation of policies by legal obligation. The purpose being to establish this before subsidies for flooding are transferred from Government to householders. The Prime Minister had indicated that he wished to see an end to the government subsidies paid to Insurers on behalf of householders who are captive to regular flooding. It is feared that if the Government sheds this current cost obligation it will result in even less motivation by "whoever is responsible" to get flood risk managed properly because by pushing the onus for effective action on to householders will not work as this entire sorry saga has proved.

Section 8: page 35. Letter dated 15 January 2013 from Martyn Mance to R Craggs replying to correspondence in section 7. As usual this acknowledged concerns but offered nothing, basically stating the obvious and reiterating what should happen but not wanting any involvement in making it happen. He seems to completely misunderstand the point about local knowledge being utilised to avoid flooding problems and the recommendation of local knowledge becoming a transparent legal requirement, (which is not without precedent).

I was alerting both the ABI and the Government to the ongoing problems of ineffective flood risk management in order to get those procedures made binding before changes were made regarding subsidization. This is because the Government both Local and National have proved to be ineffective in getting compliance with stated policies. The suggestion of streamlining perfectly adequate policies that are eminently fit for purpose if only they were implemented, just does not make sense as is pointed out in section 9.

Section 9:page 37 Letter by R Craggs dated 9 February 2013 to Martyn Mance DCLG replying to letter in Section 8. Written for the record and reinforcing concern by suggested compensation penalty because the CEO of the Local Authority refused to accept responsibility or even explain who is responsible, even though responsibility has been designated and clarified in the policies. Recording the point about FRA's being flawed through non-compliance with policies and where technical flaws in FRA's can be avoided by listening and iterative cooperation in understanding risks and developing resilient safeguards.

At this point in time the Beyond Green FRA was placed on hold by the Environment Agency.

The next step is described in sections 1, 3 and 3.

Conclusions:

Flood Risk was raised as a critical issue before Broadland DC approved the JCS proposal and it is considered that a proper Strategic Flood Risk Assessment be carried out before work progressed to far. As it stands only a rudimentary SFRA is in place and there has been obscurity concerning that. This is considered important because of the propensity of flooding in contiguous developments within Sprowston and which require greater diligence. This is especially important when developers rely on exporting water from their sites as a way of preventing flooding on their site.

The conclusions drawn from the above sections are self-evident in terms of permitted failure and demand effective action.

Buck-passing on such an epic scale at all levels and spurious excuses, including admitted and tolerated ignorance by Officers clearly indicates that there is no desire for rigorous implementation of policies. If development cannot be safeguarded by the operation of these policies then development should be brought to a halt.

If the constant failure of implementation of the management of flood risk in

this area is representative of other parts of England it is not hard to understand why flooding of homes and premises increases year on year and why it accounts for 1 in 6 homes and commercial premises affected by flooding.

Understanding the risk of flooding is everyone's responsibility to some extent but this does not spread accountability where it is defined. Understanding is a prerequisite to effective management of risk and there must be no place or excuse for professed ignorance at senior levels when a duty of care is owed.

Development and Flood Risk Strategy has to be kept in balance, which was the fundamental purpose of the PPS25 policies, which was given in response to assurances sought. We have been assured that these policies have not been over-ridden but the evidence suggests that there has been and continues to be a very dangerous dilution of planning principles with the arrival of the new NPPF regime. This could be tolerable if we knew that commonsense would prevail but this is not happening.

Elected representatives are making decisions for which they have little local knowledge is not a sustainable.

The plan proposed by the Prime Minister to switch the block flood subsidy paid to insurers on to all householders, in order to spread the cost, demands increased involvement by communities to enable existing householders to protect themselves from the adverse effects of flooding. Policies need to be enforced rather than being diluted, and developments placed on hold until the public is satisfied that flood risk is being managed properly.

In the light of the evidence produced, it is strongly recommended that this NEGOT strategy is put on hold until the letter or spirit of this Act is seen to be operating effectively.

Yours sincerely,
Robert Craggs

Section 1: Description of Formal Complaint and background.

From: Robert Craggs [REDACTED] >
Date: 12 October 2013 17:56:14 GMT+01:00
To: Malcolm Black [REDACTED] >, Phil Kirby
[REDACTED]
Cc: Phil Courtier [REDACTED] >, Ben Burgess
[REDACTED] >, RT Hon Eric Pickles
[REDACTED] >, Martyn Mance
<M [REDACTED]>, Chloe MP
[REDACTED] >, Bill Couzens

<[REDACTED]>
Bcc: Mollie Howes [REDACTED]m>, Marc Allen
<[REDACTED]>, Ben Hogben [REDACTED]>,
Nick & Pauline Millar [REDACTED]>, Natalie
[REDACTED], Hafizur Rahman-Bashir
[REDACTED]

Dear Sirs,

Herewith is the formal complaint referred to below.

Formal Complaint against Mr. Phil Kirby CEO Broadland District Council for failure of duty of care to residents relating to Section 7 of the Flood and Water Management Act 2010 re Defra publications: Understanding the risks, empowering communities, building resilience, and the previous Planning Policy Statement 25 Development and Flood Risk December 2006. The failure reflects the numerous attempts to get Mr. P Kirby, CEO as Strategic Director with Community responsibility and as the Head of Broadland District Council to have proper regard to important anecdotal information from residents for, and for the proper consideration and scrutiny of flood risk in Sprowston and with respect to Flood Risk Assessments that have been approved in Sprowston but which did not reflect the duty of care required by the letter or spirit of those policies. For the Local Authority to admit to knowing next to nothing about flood risk at a Planning Committee meeting to approve a massive development is indicative of a failure of a duty of care to local residents who do know something of the risks, as they have demonstrably proved in spite of Environment Agency assessments in the past, but whose concerns are still ignored.

The evidence and justification of this complaint lies in correspondence touched on in the emails below. The fact that the charge is made against Mr Kirby the CEO relates to correspondence with him on this matter over a number of years as they apply to the policies, procedures and responsibilities that derive from the relevant Acts of Parliament which I believe that he in his capacities in the Local Authority has failed to comply with.

Since this charge relates to failure to comply with policies relating to these Acts and that these same issues have been raised to Minister and Prime Ministerial level, I am transparently copying all concerned. My justification for this reflects the evasiveness and general buck passing that I have encountered over a long period of time even with the assistance of MP's in terms of identifying accountability and requisite competence My purpose is entirely to do with protecting existing householders from the adverse effects of flooding and increased risk.

To put a finer point on this complaint, it is an indictment in the context that Local Authorities, who have ultimate responsibility for approving Flood Risk Assessments, but whose Officers excuse themselves of any responsibility on the grounds of lack of personal knowledge on the subject of flood risk, can continue to ignore the anecdotal evidence by local residents that itself is clearly a requirement to be accommodated by the above policies but which has not been complied with. I have repeatedly asserted that the FRA done by Millard Consulting for the Blue Boar Lane/ White House Farm development is flawed but have been unable to have this assertion challenged and not least because the local authority that denies it is flawed yet claims to lack the

knowledge to discuss the FRA. The Consultant involved no longer trades, the developer refused to discuss it and the Environment Agency does not wish to discuss it. Now we see an even greater contiguous development given approval

For the record and relevant background, I attach a copy of the representation I made to the Planning Committee that gave outline Planning permission to the Beyond Green (NS&OC) planning application 20121516, together with copies of the correspondence sent to all Broadland District Councillors prior to this meeting.

I shall look forward to hearing your response to the complaint.

The attachments that were appended to this letter are shown is the correspondence in sections 2, 3,4 and 5.

Yours faithfully,

Robert Craggs

[Redacted signature block]

From: Robert Craggs <[Redacted]>
Date: 19 September 2013 22:40:25 GMT+01:00
To: "Malcolm Black" <[Redacted]>
Cc: Phil Kirby <[Redacted]>, Phil Courtier <[Redacted]>, Bill Couzens <[Redacted]>, June Hunt <[Redacted]>, Mollie Howes <[Redacted]>, Marc Allen <[Redacted]>, Nick & Pauline Millar <[Redacted]>, Ben Hogben <[Redacted]>, Chloe MP <[Redacted]>
Subject: Re: Formal Complaint re Failure to properly assess Flood Risk in North Sprowston

Dear Mr. Black,

Thank you your prompt response.

I will formulate the complaint and notify you. This email is merely one element of a very protracted issue that was escalated to Mr Kirby in both his previous and current capacities and where I believed he owed us a duty of care both as an individual with responsibility and to the organisation he heads. But this will be specified with reference to relevant correspondence that as has been referred to in the past concerning flood risk and responsibility for it.

I will be in touch

Robert Craggs

On 19 Sep 2013, at 16:44, Malcolm Black wrote:

Dear Mr Craggs – I am writing in my capacity as the Council's complaints manager and, in this role, Mr Kirby has passed me your email. I can confirm that the matter has been logged as a formal complaint and will be investigated by the head of the relevant service – Phil Courtier, Broadland's Head of Planning. The response to your complaint will be based on your email below

but, should you wish to elaborate on it in any way or provide anything further, then please send this to me and I will ensure its too is provided to Mr Courtier. We aim to respond to complaints within 10 working days and I will ask Mr Courtier to advise me if he cannot meet this timescale.

In he meantime should you wish to contact me concerning the above for any reason then please feel free to do so. However please note that I am not in the office tomorrow so will not be able to respond until next week.

Malcolm Black

Admin Manager, Democratic Services, Broadland DC

[REDACTED]

From: Robert Craggs [REDACTED]
Sent: 19 September 2013 15:43
To: Ben Burgess; Phil Kirby; Cllr Bill Couzens
Cc: Chloe MP; June Hunt; [REDACTED] Ken Lashley; Mollie Howes
Subject: Formal Complaint re Failure to properly assess Flood Risk in North Sprowston

Dear Mr Burgess,

This is not satisfactory at all as I have made very plain in the past. The requirement to take notice of local anecdotal evidence is very clear but this has not been complied with.

No one, by which I mean BDC, NCC, Env Agency and Anglian Water has even bothered to ask me to justify my concerns which derive from first hand experience of flooding in this area going back 25 years, and the risks that I have highlighted in that time translated into factual flooding.

Phil Kirby cannot possibly be in any doubt about this even if you are.

It is no good me going down to Broadland DC if there is no one able to discuss the matter with as you yourself have admitted. This is fair enough, but then you will understand why I have been questioning the authority for the approval of these FRA's. For the very first time despite asking the

I have explored every avenue to get this issue of risk properly addressed under the appropriate policies of Development and Flood Risk. Of course there are technical aspects and the situation is complex which makes the need for thoroughness in the assessment of risk so important because failure is not an option.

I would emphasize to you and Phil Kirby again, that irrespective of technical training or expertise on the subject, actual incidence of flooding is superior information to scientific research. In this respect, as a local authority, you have been in possession of important information to take all reasonable steps to get flood risk properly assessed. I cannot compel you to listen but I can compel you to pay due regard to legal and procedural requirements. The Local Government Ombudsman is not required to assess flood risk but at least has to rule on whether my complaint is justified.

Notwithstanding I will take this matter up with the relevant Secretary of State and Minister again and also formulate my complaint against Mr Kirby as is appropriate in this case.

I await a formal response with the appropriate paperwork and procedure to be complied with.

Yours sincerely,
Robert Craggs

Section 2.
Prepared Statement by Robert Craggs for Broadland D.C .Planning Meeting to hear Application No 20121516 for Beyond Green's Proposal for NS&CC Set 2013

Mr. Chairman and Councillors,

My name is Robert Craggs, I have lived at 297A Wroxham Road for 26 years and for half that time I have been a neighbourhood representative

I have opposed this Planning Application and my reasons for doing so have been previously submitted. However I want to use this opportunity to focus on only one Issue, which is Flooding and Flood Risk I would stress that my views also relate previous developments approved in this area.

My concerns are such that I took the very unusual step of writing to all District Councillors on this matter and I do hope you had a chance to read what I sent because it is impossible for me to get the technical arguments across today let alone the relevant history, which is the fundamental evidence for any Flood Risk Assessment, that needs to be fully ratified and prevention measures scrutinized.

I am also a member of the Sprowston Town Council Flood Risk Working Party, the primary aim of which is to protect the interests of existing householders, and I stress the point about representing existing householders in Sprowston

Getting information and cooperation in order to debate important evidence, as it affects flood risk to existing homes, is difficult owing to certain sensitivities that we might refer to as residents sensitivities which I will touch on later but the major problem is authority reluctance, this has not just been difficult, but is tantamount to a failure of due care by developers and relevant authorities. This is a very serious allegation but it is by no means new, which is why I have raised these issues to the highest levels in the land.

When seeking accountability, for the adverse effects of flooding that has arisen from the approval of Flood Risk Assessments, I have encountered universal buck-passing, finally being informed by the Department of Communities and Local Government, that this responsibility lies with the elected representatives. So when push comes to shove, and the flooded

victim seeks compensation, the persons culpable are our own elected representatives – that's the bottom line.

I have known this for quite a long time now and it is not something to crow about, at least I can look you in the eye and say I informed you first. I am sorry to say it, but no doubt unwittingly you have let us down badly, but obviously not with any intent or indeed full awareness. I am clear in my mind that a lot of people are hiding behind you. People who write laws also have an eye on the consequences and they know where the buck stops. A Developer is responsible for conducting the Flood Risk Assessment but is not necessarily responsible for subsequent flooding.

Let me tell you another thing. I am not one for increasing public sector costs, I have spent my life running private enterprise companies but some 10 years ago I advocated the recruitment of an hydrologist for Broadland - obviously in a planning related role. The response I got was negative let's say - my reply was along the lines that I could only think of two local councils where I would advocate such an appointment, one is in the Lake District and the other is in Broadland. That is if accountability truly lies with the Local Authority.

It is an onerous responsibility that can vary enormously from area to area and I empathize and sympathize with those who have to make decisions on flood risk. But if you are in such an area, CAUTION is the order of the day.

Flooding and flood risk, is much more complex than it is simple, and it is an onerous responsibility for those who approve these schemes and one can be only too easily convinced about mitigation measures.

I have some experience of large mitigation measures involving a drainage lagoon with 16 boreholes in Sprowston monitored over a 25 year period in this area that I wrote to you about. Do not assume mitigation measures to always be effective.

Going back a few years, I had previously been led to believe that it was the Environment Agency that approved flood risk assessments, but clearly this was not the case then, and neither is it today. Similarly, in the past I have been diverted to Norfolk County Council, as the lead authority for investigating flooding and flood risk, but the fact is that actual responsibility lies squarely with the Local Authority, and specifically with elected Members. A point, I hasten to add, that I have vigorously contested with the Government Ministry concerned.

Lay aside for the moment the fact that the developer is responsible for the Flood Risk Assessment, anomalous though it is, it is not self -regulation - the onus of responsibility lies with those who approve the assessment.

I accept my responsibility in this matter, and flooding is everyone's responsibility to a degree. As the head of the company I managed in this area, that I took my responsibilities to the local community very seriously, that was the case concerning flooding 25 years ago and that sense of responsibility - to that same community has never ceased, just as it has grown in other sectors

of Sprowston.

But I also expect others to accept their responsibility when it comes to taking reasonable precautions to prevent flooding - and therein lies that classic catch all element of the law taking all reasonable steps. My assertion is that reasonable steps have not been taken here and anyone who read the correspondence I have sent to them will understand why.

Mr Chairman, I cannot apologise for writing directly to publicly elected Councillors who have such responsibility. Because I see no difference in the principle of writing to my MP; Ministers; or the Prime Minister. And I have done precisely that over several years now on this issue. Flooding is a subject of national importance, as we know. What we might not know is that 1 in 6 of all private and commercial premises in England are affected by flooding and the figure grows every year, such that now this Government has had to address the issue of abandoning the flood subsidy. This has direct relevance to the same issues about the adverse consequences of flood risk in our locality, so it is not some esoteric or abstract issue, it applies here in Sprowston which prompted the walkabout with our Member of Parliament and the Chief Executive of this Authority to identify flood spots and point out real threats. I will happily do the same for you.

The correspondence sent to higher authorities over the last decade is considerably more than what I sent to you in the last couple of days. Yes! you might say, and how do you expect me to digest this stuff two days before this meeting. All I can say is that I can trump that comment, there is important information on flood risk as it affects this application that I have not seen yet. I have not seen what is supposed to be, or even called a Flood Risk Assessment for this planning application - so you can see what will be in my correspondence to Ministers. I have no alternative because here we go again and the effect of the last FRA has not even been tested yet because the site has not been built on.

I can furnish the Government with good reasons to explain why flooding is occurring at an ever growing rate. And this area, and the developments proposed around it, serves as a very good case study.

Given the propensity for flooding in this area, it is of paramount importance that local anecdotal evidence is heeded, indeed it is a policy requirement embodied in the Flood and Water Management Act of 2010, and in the previous policies namely PPS25 Development and Flood Risk 2006. My concerns about flood risk in this area originated before then when the 2001 Act applied. But the problem is that these requirements are still not being implemented properly.

I reject the FRA done by Millard Consulting for the Blue Boar Lane/White House Farm development as flawed and frankly, I fail to see how a Local Authority, with whom the responsibility for Flood Risk rests, can take us into a position of greater danger, when they do not even understand the previous Flood Risk Assessment. And now we are talking about a much greater area next to it. The Development and Flood Risk policy is very clear about

contiguous developments like this in terms of responsibility to the public – but those requirements are not being complied with.

You may say but these planning applications are different, but flooding and flood risk is no respecter of arbitrary boundaries. On the contrary the significance of contiguous developments, poses a much more serious problem, and what makes it worse still, is that this area within a relatively small radius has experienced actual flooding in three locations described in my letter to you. This requires additional diligence according to these policies, especially when you examine this in the context of the overall land drainage system in Sprowston -but I have seen any risk assessment for this combined area.

Allow me to describe the emphasis placed on the spirit of the Act

The spirit of this Act is that it provides for better, more comprehensive management for people, homes and businesses.

Let me leave you with a thought: I mentioned earlier that talking about flood risk is a very sensitive subject, that is one of the reasons why I wrote to you and why I have not mentioned locations at risk. People want assurances against flood risk, but if they experienced a hint of it in their own place they would not advertise the fact. If they could channel it away they would. How many homes have surface water connected to drains illegally. Countless thousands and we think that this water is seeping into the ground. That water is being transferred it is not being drained away naturally. When people are flooded the first sign invariably is water bubbling up in the downstairs toilet. That is a very good indicator of flood risk but very difficult to ascertain -and you will not see this in statistics they push in front of you.

Dear Councillors, We are not legal eagles and we do not expect our elected Councillors to be either. But we need to be sure that you understand the spirit of this legislation that is crafted to protect us. We have no doubt whatsoever that you have the interests of the community at heart - but do not unwittingly let us down on this.

Please do not approve this until the Town Council Working Party has been able to see and scrutinise this FRA, which I for one have not yet seen. I strongly recommend that you postpone your deliberations on this Planning Application and give the public a right to scrutinise these flood risk assessments. After all it is their homes that are at risk.

I am at your service in this respect

Thank you.

Robert Craggs

September 2013

Section 3:

This is a letter re Flood Risk Assessment in North Sprowston dated 20 September 2013 and sent to all to Broadland District Councillors The purpose is self-explanatory.



Broadland District Councillors,
c/o Democratic Services
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich, NR7 0DU
Tel: 01603 431133

cc Cllr. Bill Couzens
cc Ms. Chloe Smith MP
20 September 2013

Dear Councillors,

Flood Risk in North Sprowston Norwich

I write to you as a very concerned resident on the matter of flood risk in this area though my concerns are not confined to Sprowston or Broadland but even further afield. However I wish to explain to you why I have these concerns that are primarily about ineffective policies and procedures to do with Development and Flood Risk.

Flooding and Flood Risk are very serious matters and it is also a very sensitive issue as it affects property values and insurance premiums. I have

always been conscious of this, just as I have been conscious of my responsibilities to the community, particularly regarding existing residents.

My concerns are well known to Sprowston Town Council where I have served on the Flood Risk Working Party, so any reference you may seek regarding my credibility can be obtained from there or from Councillor Bill Couzens who has also served that working party.

I have resided in Sprowston for 27 years and I first became aware of flooding problems when I was appointed to take control of the UCP business on Salhouse Road when my employers, the Metal Box company took it over. The last thing anyone ever expected to have to address from a due diligence point of view was flooding stopping factory operations. This was not minor flooding and I was quite alarmed especially after examining the significant mitigation measures that had been installed to prevent what I discovered were regular episodes of flooding. My concern for nearby residents was always a priority and I have a continuing sense of that.

The phrase “that last thing I expected” is apt, as millions of flood victims in England will testify. It is a salutary fact that 1 in 6 commercial and private properties in England are affected by flooding. And we live in Broadland.

As it happens I am a fully qualified mining engineer and practiced for several years. In this capacity I had a statutory responsibilities for mining operations and you will understand the significance of the hazards of flooding and appreciate my sensitivity to flood risk, which has been honed by training and experience and accountability.

I am not an expert in hydrology but I have been adjudged competent to manage any mining operations in the UK so my awareness is on a higher level than the average person. That said, a fundamental requirement under the Mines & Quarries Act is that a person responsible for any mining operations must not just take note of local and anecdotal evidence, but must take all reasonable steps to acquire that knowledge. This does not just apply to old underground workings but to acquiring knowledge before you even think of sinking a shaft or a tunnel or even quarrying. I am describing this to you because it lies at the very heart of my purpose in writing to you because you too have a very onerous responsibility.

I have pursued the subject of flood risk in this area in as comprehensive a way as possible and there is no authority anywhere directly related to the subject that I have not engaged on the matter. It is right to state at this point that my current MP, Ms. Chloe Smith and her predecessor Dr. Ian Gibson could not have been more helpful or supportive and the extent of the correspondence showing their involvement is available for you to examine.

It is worth emphasizing at this point that we are talking about flood risk and the assessment of risk is not always easy, but I will return to this later because it can also be very easy to assess - but getting people to listen and understand becomes the real issue and second only to getting people to accept responsibility for flood risk and flooding.

Focusing on who is responsible:

When I point out that the principal responsibility lies with your good-selves you may be surprised, but you must look at this in terms of who approves flood risk assessments. Having pursued the answers to these questions for some years through a labyrinth of buck-passing, I have it on authority from the Department of Communities and Local Government that the responsibility lies with you as the elected representatives.

But we have all these Mitigation Measures in place?

I fully understand this but mitigation does not ensure prevention.

26 years ago, I instituted what I considered to be effective mitigation measures to prevent flooding in the area of the UCP factory as it is locally known but successive acquisitions changed the name-plate. It is in a residential area so sensitivity is appropriate here. These measures included renovating an existing sump or lagoon and reaming out and deepening the existing 16 boreholes and installing an oil separation device to prevent pollution. Steps you would expect a multi-national company of Metal Box's standing and image to take and consistent with their policy regarding responsibility to the community. What I am saying is that this was not a small job but one that was undertaken professionally and at no small cost.

I describe this to illustrate that I understand flood mitigation. I also understand the sustainability effect of this mitigation measure because I continued to monitor it and I know the history. This is also a sensitive issue because the responsibility for this does not necessarily rest with the company concerned so no conclusions should be drawn. Suffice to say that flooding re-occurred.

Flooding at Sprowston Park & Ride site:

I am sure you will know the story or the saga relating to this development. The authorities do stand to be severely criticized but most importantly we need to learn the lessons.

Local people like myself wrote to the Councils concerned protesting the folly of this development in terms of flood risk. This included meetings between Residents Association representatives and NCC and addressing the relevant NCC council meeting. Prior to that it had involved our MP. Dr. Ian Gibson who convened a special meeting with officials of NCC, CPRE and myself and this included discussion on the wisdom of the development itself, alternatives and mitigating measures such as a lagoon and drainage boreholes. I challenged the sustainability of this but the development still went ahead. The Environment Agency stated that flooding would be a 1 in 100 year event and the developer NCC, and planning approver BDC, stood behind this ludicrous assessment – ludicrous because the propensity to flood was well known and for surface water to lie there for 7 months in the year flew in the face of flooding being a 1 in 100 year event. I suspect that they thought their mitigation measures were adequate! An assumption I had myself made, but I had found myself in that position, I had not created it. This underlines the first

principle of flood prevention – avoidance. It also underlines the first steps to be taken in flood risk assessment: ask if flooding has occurred previously in this area and take heed of the answer.

I had direct experience from 15 years earlier and continued observation, but others knew of the propensity for this area to flood many years before I arrived. Why were they not listened to?

At this point it is worth recapping, here are two substantial drainage sites, within a relatively short distance, with significant flood mitigation measures but still flooded. One has to question the sustainability of these systems especially when the fail- safe measure is to pump into the highway drainage system.

Home Farm Development:

A long established drainage ditch or culvert runs through this site, which is situated between the Sprowston P&R and the location mentioned above. It is contiguous with the P& R site and this point about contiguity is very important in any assessment of flood risk and north Sprowston is a classic example. That this Home Farm was prone to flooding was perhaps not so well known but a bogged down tractor was often the giveaway clue because this site too could not be ploughed for months on end.

The same concerns about development on this site were expressed and the FRA that was carried out also showed an endorsement from the Environment Agency of flooding being a 1 in 100 year event.

Attempts to have the Development and Flood Risk Planning Policy Statement 25, regarding Development and Flood Risk December 2006 requirements applied were resisted because outline planning approval had been given earlier, and these requirements were not retrospective. However the concept of deploying natural soakaways was abandoned and a more sophisticated underground mitigation system for surface water retention and slow release was adopted with some success, but it did not prevent flooding that occurred on 25 June 2007 and reported on by the late Mr. Mike McKechnie and myself.

Blue Boar Lane/White House Farm Development FRA:

This too is contiguous to the above mentioned locations but is much bigger in area, and is situated adjacent Blue Boar Lane and through which the major land drainage culvert runs. This can be traced through Wyevale Garden Centre to the drainage lagoon situated adjacent the UCP factory mentioned earlier. I consider this FRA to be flawed and this is part of an ongoing protracted issue that includes responsibility for any adverse effects of flooding to existing homes.

To emphasize my concerns this matter has been referred to the Prime Minister and Deputy Prime Minister. This correspondence is available for you to see. One such document encapsulating the points made above, is an attached letter dated 13 February 2013 addressed to Martin Mance of the

DCLG.

To my mind this matter is only resolved by you informing me that you approved this FRA and there my case has to rest.

Beyond Green Planning Application: NS&OC

As you know, this proposal is much bigger still than the contiguous Blue Boar Lane development that has yet to be built but which has planning permission.

Because I had had so much difficulty in getting access to previous Flood Risk Assessments, both during preparation and after they had been submitted, and for which there was no information presented to the public to scrutinize, and partly because of reliance on these being carried out in accordance with PPS 25 procedures and regulation, - I took a proactive initiative and invited Beyond Green Executives to a site visit and physical overview assessment. A report on this dated 17 February 2011 is attached. Bruce McVean will be known to many from his frequent presence at Beyond Green consultation meeting and exhibitions and Alf Townly, a former colleague of mine who had responsible for the UCP factory operations and who is familiar with the history and the area.

The notes are quite comprehensive in detail and scope. One can only add to these points from what one has subsequently learned.

I have opposed the Beyond Green planning application and the reasons are on file and one of the reasons is the increased flood risk.

I also do not think that the Beyond Green Flood Risk Assessment is adequate. I think it should be a stand-alone document that is easily identifiable so that it can stand scrutiny by the public. Beyond Green also state that they cannot identify the cause of the Sprowston Park & Ride flooding which is a fatal flaw in their risk assessment because it is such a significant factor being contiguous to their site

Reference to these notes also serve the purpose to illustrate the need for a Strategic Flood Risk Assessment (SFRA) and one that is available for public scrutiny.

Position of the Environment Agency re Flood Risk Assessments:

There is a commonly held view that the Environment Agency is looking after our interests, but this really is an over reliance on them and not really a reasonable expectation when you examine the facts.

Might I draw you attention to the letter from the Environment Agency dated 3 May 2013 addressed to Mr B Burgess of Broadland DC. See attached and please refer. It relates to the Beyond Green or North Sprowston and Old Catton (NS&OC) development and it explains the Environment Agency position and it is this principle, indeed condition, that I wish to draw your attention to. Which is that this is not an approval of the FRA: that responsibility clearly lies with the local planning authority.

Contrary to what has been stated the Environment Agency does not approve flood risk assessments and they did not approve any of the other assessments that I have referred to. This is an important factor for anyone wishing to scrutinize a FRA and question the basis on which it was approved.

Joint Core Strategy and NEG T

Flood Risk is a critical subject but in the fog of this JCS, it does not seem to have got the attention it deserves though it was raised as a significant critical issue before the JCS was approved.

My conviction is that FRA's should be done within the context of and by direct reference to a SFRA. Sequential addition of developments that rely on exporting water and utilize mitigation systems can pose just as big a problem as they set out to avoid, and our own history proves this.

Concluding Comments

This letter is not intended to be technical but to focus on the risks of flooding occurring and where the responsibility for prevention lies.

The responsibility for carrying out a flood risk assessment lies with the developer and this at first sight looks like an anomaly but the overriding responsibility lies with those who approve these FRA's. This responsibility tends to slide into obscurity to the extent of responsibility being evaded.

The problem of Developers not accepting liability for subsequent flooding, especially to existing homes, is a very real here in Norfolk as it is elsewhere, but with whom does accountability lie?

Seeking the answer to this has been a specific quest as I have described and when I report that the official answer is that it lies with yourselves: My immediate response, as someone who understands the trauma of flooding and the burden of responsibility, is how would I execute my responsibility on such an issue when there are so many factors to consider.

You will be aware of Defra and the Environment Agency publication entitled Understanding the risks, empowering communities, building resilience, as being the document for guidance on flood risk management. I am not satisfied that these principles are being complied with, not within the letter or the spirit of the Act of Parliament from which they derive.

Part of my purpose in writing to you is to improve understanding and the risks in this area in particular and with a view to contemplating the very significant risks ahead.

By its nature it requires detailed attention for which individual knowledge and experience is just as important as expert opinion. Anecdotal evidence trumps all scientific prediction but it is ignored, at least that is my experience.

And there is the irony that we live in flat area that is really a huge flood plain with water everywhere and yet are shocked when we experience flooding.

Incidence of flooding has increased considerably in recent years and it is not primarily due to climate change but to development.

Yours sincerely,

Bob Craggs

Section 4:

Meeting and site visit with Beyond Green on 17 February 2011 to discuss Flood Risk in North Sprowston. The appendices referred to are not attached here for reasons of brevity.

Following a presentation by Beyond Green I invited them to a meeting and site visit to study the situation at first hand and to listen to the residents viewpoint. Contact with Beyond Green was maintained on occasions that they held presentation/ consultations when these same issues were briefly revisited and one looked forward to studying their Flood Risk Assessment with them, but disappointingly this never happened. There was however a premature planning application made by them that they clearly stated was premature but their FRA was not clearly presented in an obvious way. However i did study the water cycle report produced by Peter Brett Associates for Beyond Green and what appeared to be a flood risk assessment and i commented upon it at some length in my representation responding to the planning Application. This was summarised by Broadland DC in usual fashion making sure that my reasons for objecting to the FRA were not mentioned. This is a serious omission bearing in mind that we are talking about flooding in an area that has seen flooding. Under the circumstances of my detailed concerns about flooding I consider this omission to be negligence by BDC. Even for someone who does not understand flood risk there cannot be any excuse for failing to understand a simple but significant fact. This was in relation to the Peter Brett report stating that they did not understand the cause of the Sprowston Park & Ride site flooding. This Park & Ride site is immediately adjacent the Beyond Green site. The flooding to this P&R site in the past and its propensity to continue flooding is very important and it's history warrants a very careful study though it is patently obvious to anyone that the works undertaken to drain this site are extensive by any standards.

This was a site that local people protested strongly would flood even without putting a huge hardened surface down for a large car park. Extensive works were undertaken in deepening and enlarging and excavating an even bigger lagoon with drainage boreholes because of repeated flooding and finally additional tanks were installed alongside the original lagoon with pumps to pump surface and groundwater water into the highways drainage system. In short exporting the problem. It is generally viewed and certainly considered by District Councillors near and far that the problem of the Sprowston Park & Ride site flooding has been resolved but what it really is, is a monumental failure of sustainable urban drainage and in an area contiguous with other development sites that warrants extra special attention according to the the Planning Policy Statement 25 covering Development and Flood Risk 2006

and and now incorporated into the national flood risk management strategy for England entitled Understanding the risks, empowering communities, building resilience. To state that the cause of such flooding in a development immediately adjacent to their site the Developer cannot possibly expect his FRA to be accepted in my opinion as a local resident living 200 meters away and especially when this is but one of three sites that has seen flooding and in very close proximity.

It was for this reason that I, as the Representative for Chenery Drive and Wroxham Road Residents Association, together with the local CPRE representative Richard Harris, took the matter up with our MP at the time Dr Ian Gibson and his involvement in in the documented correspondence on concerns about flooding in north Sprowston that resulted in the involvement of the then Secretary of State for the Environment Rt Hon David Miliband because the CEO of BDC and the Director of Strategy and now the CEO of Broadland DC, the CEO of Norfolk County Council, the CEO of Anglian Water together with Environment Agency Officials declined offers to meet with residents to discuss the flooding risk problems that MP Dr Ian Gibson agreed to chair.

The assurances sought by the residents eventually came from Defra in the form of the new policy PPS25 Development and Flood Risk effective December 2006.

It should also be noted that in communications with the Environment Agency that not only had they lost a series of communications relating to anecdotal evidence of flooding but also they had no record or knowledge of groundwater flooding in this part of the world but the area close to the park and ride has abundant evidence of this as it is elsewhere in north Sprowston which has historic drainage channels and drainage pip[es], so there has always been a big question over the assessments made by the Environment Agency. However in all the many pursuits to get this matter properly understood and addressed everyone has hung their hat on the Local Authority being responsible. And that responsibility has eventually fallen on the elected representatives as Sections 5 and 6 describe

[REDACTED]

in Sprowston and North East Norwich

In Attendance: Jonny Anstead (JA) and Bruce Mc Vean (BMV) of Beyond Green and Alf Townly (ANT) and Bob Craggs. (RC)

Purpose: To acquaint Beyond Green with facts and concerns about flood risk.

RC expressed thanks to JA and BMV of Beyond Green for their preparedness to come and discuss flood risk in the area.

RC and ANT presented anecdotal evidence of flooding and the contributory causes not least the failure of authorities to heed the warnings of residents.

1. RC and ANT discussed their experience of flooding at the UCP factory on Salhouse Road where there is quite an extensive drainage lagoon with 16 boreholes. Parts of this factory, in particular the very large Boiler House repeatedly flooded despite the nearby large drainage lagoon. In 1987 extensive works were carried out reaming and deepening boreholes, installing an oil interceptor and creating a bund to contain and prevent re-occurrence of flooding. The large Boiler House was particularly vulnerable to flooding but of prime concern were the properties of local residents in Blythewood Gardens.

In 1994 there was a reoccurrence of flooding and remedial action taken by deepening boreholes.

In 2001 there was another occurrence with residents garages affected and flood water within 2 inches of resident's doors. Further improvements to prevent flooding were carried out including cleaning out and deepening of boreholes and raising the surrounding bund.

RC and ANT were expressing their concerns following their acknowledged failure to effect a permanent solution - but consequently have a much better understanding of why this drainage system has a limited effect in this area and this is summarized in RC's response to Norfolk County Council's Connecting Norfolk Transport Plan for 2011-26. See Conclusions page 4 para 7.

2. RC produced extensive correspondence and official drawings to illustrate his concerns and those of fellow residents, viz representatives of Chenery Drive and Wroxham Road Residents Association and CPRE and Blue Boar Lane Residents Association.

Before the Park & Ride was constructed the site was subject to frequent flooding. This was a matter of serious concern and contention that RC took up with the help of his MP Dr Ian Gibson in a meeting with senior NCC planners with Richard Harris of CPRE in attendance. The purpose was to convince NCC of the problem and establish how NCC intended to overcome the flooding since the Director of Planning and Transportation had dismissed the issue as a mere technicality. Bore holes were suggested to which suggestion RC related his experience (which NCC now concurs with regarding drainage boreholes silting up). Then a drainage lagoon was incorporated into the plans which RC pointed out would only fill up because the area

was very slow draining. CPRE were extremely helpful and enclosed is an extract of a letter From Richard Harris of CPRE to M Terry of NCC dated 28th October 2002 that confirms points made in this report and which were subsequently realized. See App i.

The statement that flooding would be a once in a hundred years event was derided by residents who saw extensive flooding 3 times in the first year of opening. Further attempts at achieving an effective soak-away system failed even when enhanced with boreholes. Deepening the first lagoon to below an impervious layer of clay improved drainage but of course has increased the hazard of anyone drowning. A second bigger additional lagoon has been constructed, together with boreholes in the original deepened lagoon and in addition to a collectivization or attenuation/storage system of conveying water away in a controlled manner via pipeline from the site in a northwards direction via existing drainage ditches on either side of Wroxham Road.

3. Shortly after the issues with the P&R were raised came the planning application for the Diversion of Blue Boar Lane and a Housing and Commercial Buildings application on Home Farm that again raised the issue of flood risk. This resulted in a proposal for an underground attenuation/storage release system to drain in a controlled way into the existing drainage ditch. There was detailed correspondence again up to Secretary of State level, see attached App ii DEFRA letter from Ian Pearson on behalf of David Miliband dated 15 December 2006). This step was necessary because not only were authorities not heeding the warnings but no one accepted responsibility and this included the Environment Agency; the CEO Norfolk County Council; the CEO Broadland District Council, Go-East EERA and the CEO Anglian Water – though the CEO of Anglian Water explained that this was outside the scope of AW's authority. The correspondence showed in fact that every one of these authorities disclaimed any responsibility. See App iii letter dated 13 January 2005 RC to CEO's and MP. The CEO of BDC pointed out that his council did not employ anyone with such expertise in flood risk– yet, ironically this authority 'Broadland' - approved the plans. See Appendix iv letter dated 24 February 2005 to RC

Also attached is a covering letter dated 26 July 2007 (App v) from Stuart French of NCC entitled Flood Risk North Sprowston. Apart from outlining further works to the Park & Ride to prevent re-occurrence of flooding it also addresses RC's request (supported by his MP Dr Ian Gibson) to meet with representatives of the various authorities. This never happened and serves as another example of the indifferent attitude of local authorities in the area to 'consult' even on serious matters such as this. Consequently further large scale developments in this same location of North Sprowston namely the Tesco Extra store extension and Fuel station and the very dense housing development on Home Farm prompted RC on behalf of residents to issue a warning of preparedness to sue authorities for negligence in event of residents suffering flooding; increase in insurance premia, or refusal to indemnify householders because of the proximity of their homes to a flooded area.

Promised legislation in the form of DEFRA's Planning Policy Statement 25 came too late for the aforesaid developments but what is most disconcerting is that this legislation still does not seem to be heeded. The Greater Norwich Development Partnership's proposed Joint Core Strategy shows no evidence of a comprehensive Flood Risk Assessment consistent with PPS 25 having being carried out.

4. Scientific Data Vs Anecdotal Evidence:

RC presented documentation showing efforts that he had made to get information from developers to prove that they had taken reasonable steps to assess and prevent flood risk and to cross reference this with the Environment Agency. See attached (App vi) covering letter dated 22 June 2004 from Stuart Rickards of the Environment Agency to Broadland District Council relating to Home Farm development at Sprowston which states that on the basis of information submitted to the EA they are satisfied that flood risk off-site will be no greater than the existing site for all storms up to that of 1% annual probability of occurrence event (1in 100 years). RC was in contact with Stuart Ricketts on this disagreeing with his decision and the data on which it was based, on the basis that the site in question, then a field could not be ploughed at times because it was swamped. Albeit when it was ploughed it aided drainage significantly because the nature of the soil in this area easily compacts and is slow draining.

However if the culvert in question, that is, the Home Farm drainage ditch, was deemed to be adequate, then run-off from this development even with an attenuation/storage release system had to pose an increased risk of flooding elsewhere – it could not possibly be deemed to be of no greater risk.

Needless to say on 26th June 2007 with the attenuation system operational, flooding occurred around the bridge over the ditch on the re-aligned Blue Boar Lane. Water was cascading from the Tesco car park and judging by the resulting confluence, water from the Tesco car park was meeting water from the installed attenuation system on Home Farm resulting in localized flooding. Please refer to the attached letter (App vii) dated 26th June 2007 from the late Mike McKechnie spokesman for the Blue Boar Residents Group. RC was with him in attendance with Anglian Water personnel whom Mr. McKechnie called out to investigate residents' toilets bubbling up.

5. The Planning Application by Norfolk Homes to build on Home Farm was opposed by Blue Boar Lane Residents Association and Chenery Drive & Wroxham Road Residents Association at Parish and District Council meetings primarily on the bases of flood risk and traffic congestion. Despite this, Norfolk Homes intended to drain surface water from their Home Farm Housing Development by use of conventional soak-aways and also absolved themselves from complying with the PPS 25 Regs on the grounds that their application had pre-dated these regulations. Residents protested that the system of conventional soak-aways was unsustainable and Norfolk Homes finally took heed by piping surface water run-off into the underground attenuation system and hence conveying it into the drainage ditch.

Many of these houses have been built on elevated foundations some 6-7ft higher than the original ground level to avoid flooding but this is not a precaution existing houses can take.

It should be noted that this site operates a surface water collectivization system conveying water northwards via the existing drainage ditch as does the subsequently modified Sprowston Park & Ride drainage system. The planned and much larger development on White House Farm and Blue Boar Lane will drain in a similar fashion utilizing the larger drainage and almost parallel ditch that runs from Salhouse Road past the Wyevale Garden Centre northwards through Whitehouse Farm through

the Golf Course en route to Rackheath.

6. RC and ANT accompanied JA and BMV to see the surrounding area that had been discussed: In particular the tilled NCC land bounded by the Sprowston Park & Ride and the Wroxham Road residents homes, the St Mary's Groves residents homes and the cemetery. This is shown on Beyond Green drawings as proposed or possible development. RC questioned the wisdom of this since it would contribute significantly to the risk of flooding including properties mentioned and its best use was for continued agricultural purposes because when ploughed and tilled it assists drainage.

7. Conclusions:

It is precisely this system of developers having to convey water away from their respective sites to prevent localized flooding that adds to the propensity of flooding elsewhere that is so alarming; especially given the geographical and geological context together with the magnitude of proposed developments in the so called Growth Triangle.

Scientific data should be used to understand and complement anecdotal evidence, but anecdotal evidence given pre-eminence because it is fact.

The following is an extract from a letter from RC to Norfolk County Council re Connecting Norfolk Transport Plan 2011-26 and responds to the NCC own statement quote: "extreme events such as flooding, which are likely to become more prevalent in future years" end quote; though repetitive in some respects it serves as an overall summary and reveals how we have tried to impress upon authorities our concerns. It is to Beyond Green's credit that you have been open to discuss this matter and for which we are appreciative.

The propensity for flooding is far more important than has been recognized as evidenced by failure to listen to local community warnings and which continue to go unheeded. We are having a mammoth Joint Core Strategy edict rammed down our throats and drowning our protests when GNDP has not even produced a coherent Regional Flood Risk Strategy. Not dissimilarly, the JCS does not have a Traffic Impact Assessment. There is a major credibility problem with Local government in this area especially with regards to meaningful consultation.

As for flooding, it is apparent to me from my assessment that the bigger Norwich becomes the city itself will succumb to flooding not unlike other old Roman towns in England such as Carlisle and York.

Previously NCC BDC and the EA refused to accept responsibility for flooding arising from new proposed developments, the exception was the EA but their concern was confined to areas near rivers or watercourses. Recent developments have gone on to add to the likelihood of flooding especially in the area of the proposed growth triangle in the north-eastern quadrant.

Important factors to consider in compiling a Flood risk assessment are:

1. Consider the proposal from Natural England to allow a large chunk of NE Norfolk including places like Hoveton to succumb to the sea. This resulted in a public outrage and understandably so until the concept was dropped, then people dropped off to sleep again. However the underlying factors that led to Natural England making their recommendation have not changed. Basically they realized that they were up against mother nature and it behoves us to understand that what happened in the 50's might occur again.
2. The geography, topography and geology of Norfolk and the NE Norwich so called growth triangle need to be understood. It is low-lying and close to sea level and to the sea. The Broads give a picture of water lying on the surface covering wide areas and other areas of standing water are an indication of the presence of water tables and permanently saturated ground. Saturated ground is precisely that and is incapable of further drainage.
3. If one looked for drainage paths as suggested in PPS Reg 25 one might consider an aerial view of the meandering Wensum and river systems generally. This suggests a flood plain and this is confirmed by its position in relation to ordnance datum. The need for wind pumps aka Wind Mills, but are not wind mills but wind pumps, have been relied upon together with organized sluices for centuries now to effect drainage for agriculture and animal grazing. This was long before acres upon acres of hard surfaces were laid down for developments - making flooding progressively more likely.
4. The geological structure of the area is an important factor but less so when the ground is fully saturated. Even if the strata was pebbles or sand or chalk, if it is saturated it is saturated and further rainfall results in run-off. However where there is impermeable clay it makes local drainage that more difficult. People assume that by digging a hole they will effect drainage, yet NCC failed to understand this simple fact that is widely evidenced by the presence of the Norfolk Broads which resulted from peat extraction and the excavations filling up with water. Similarly putting down boreholes is assumed to be an effective draining method which it is in some circumstances, but people also drill boreholes to get water.
5. As a generalization, drainage by natural soak-away is not sustainable in this area which I think will be recognized now following the experiences at Sprowston Park & Ride and Norfolk Homes development on Home Farm at Sprowston where the original plan for soak-aways was sensibly abandoned. However there is an underground water retention and slow release system installed there that releases water into the drainage ditch that heads north to Rackheath via the golf course. On the Park & Ride after the deepening of the existing lagoon and addition of another bigger lagoon also now has a release system for water to follow a similar pathway into the drainage ditches on either side of Wroxham Road draining north to Rackheath. A bigger drainage ditch runs from

Salhouse Road past the Wyevale Garden Centre also going north to Rackheath. So Sprowston in effect exports surface water. When the much larger Blue Boar Lane development goes ahead linking Home Farm development all the way to Salhouse Road it too will convey surface water north via these ditches. The danger of flooding homes on Blue Boar Lane has been pointed out many times. In the past there was a pond at the bottom of Blue Boar Lane with the junction of Wroxham Road it has been covered up and the water dispersed but one can be quite certain that the ground underneath is permanently saturated. Flooding has also been encountered at the bottom of Chenery Drive adjacent the Blue Boar Inn. The concern with these new developments exporting water because natural drainage is not effective will result in a cumulative effect increasing the risk of flooding somewhere else such as RackHeath Hall which has also flooded in the past. Flooding occurs on Rackheath Trading estate pointing to the probable folly of building a town at Racjkheath.

None of these huge developments should have been proposed without a Regional Flood Risk Assessment let alone a local flood risk assessment. Carrying out a flood risk assessment is the responsibility of developers, but if developers are going to rely on conveying water away from their developments it is not difficult to envisage the cumulative effect especially in an area the size of the growth triangle comprising of several major developments that are not that far from the Broads and with the type of conditions described above.

6. On a bigger scale, with a meandering Wensum and Yare and related tributaries which can pull in several drainage paths in a capillary effect - and not that far from the sea - one must not be surprised if Norwich City floods. The Wensum in Norwich is clearly tidal to start with.
7. If the authorities can ignore local knowledge and proceed regardless on a small scale such as experienced on Sprowston Park & Ride, with a senior executive asserting that it was a mere technical matter for which an engineering solution could be found – surely one would think produced a rude awakening. It puzzles me therefore that they can be contemplating much bigger developments that will have a similar effect on a larger scale especially if the conveying of water away from these developments is relied upon. Even natural drainage contributes to the problem if we are talking about a mere 20metres above OD. The effect of multiple developments shunting water towards the sea does not just have a lineal compound effect it is more of an exponential problem and the risk of flooding is accelerated.
8. As for climate change effects I am not qualified to predict what it would mean but I can appreciate what it might mean. We no longer can merely dismiss flooding when it occurs as being the result of a particularly heavy downpour or run of wet weather. We can

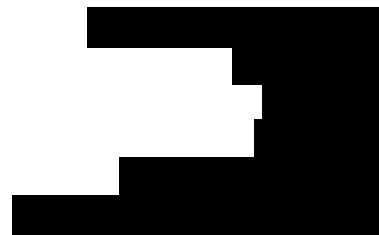
reasonably assume that this is a real danger in this area and coupled with a big tide and prevailing wind the chances of flooding are as high here than most other places.

9. Land left to agriculture, especially tilled agricultural land that because of its wide area, obviously has a chance of draining more surface water. The rate of drainage for a given type of ground or strata can be assessed as a quantity for a unit of area eg. gallons drained per sq. metre Developing say 80% of a given area and leaving 20% for natural drainage say in a collection area may look logical but it is not because it does not change the rate of drainage that much so it is not wise to assume that by leaving a piece of land or digging a lagoon will necessarily cope.
10. Trees are also excellent natural water pumps besides assisting with reducing carbon dioxide. Logically a solution for low lying land like we have that has a propensity to flood would suggest planting many more trees rather than concreting it over.
11. And of course there are water-polluting effects too with petro-chemical pollutants replacing nitrates to some extent” End quote.

R Craggs February 2011

Section 5:

Letter dated 23 January 2012 to Prime Minister and Deputy Prime Minister regarding developments going ahead without proper FRA compliance. This appeal was made after several years of trying to get all of the authorities concerned to listen. It was delegated down to no effect as subsequent correspondence shows.



Prime Minister David Cameron
Deputy Prime Minister Nick Clegg
10 Downing Street
London SW1A 2AA

Recorded Delivery

23 January 2012

Dear Sirs,

Developments going ahead without proper Flood Risk Assessment for which there is no accountability for the approval of a flawed Risk assessment and where the CEO of the District Council accepts no responsibility for the adverse effects of flooding to existing homes

We appeal to you because we have been unable to get a satisfactory response from the Department of Communities and Local Government to the problem described above. This was referred to Rt. Hon Eric Pickles and the attached reply received from Matthew Bignault, but this does not address the problem properly because the problem is where the law or Code of Practice on flooding was not properly adhered to and the Local Council will not acknowledge any accountability for this. These are not nit-picking issues, one essential requirement of the PPS25 Development and Flood Risk rules is that instances of local flooding has to be taken into account in the assessment and this was not done. Another flaw was the failure to understand the large drainage system that drains into the area to be developed. Also the Environment Agency has stated that it did not approve this FRA.

We thought this entire problem of flood risk in this area would have been resolved after having it referred by our previous MP Dr. Ian Gibson to the Secretary of State for the Environment at the time, Rt. Hon. David Miliband who gave us assurance in the form of the regulations relating to Planning Policy Statement Development and Flood Risk December 2006. Unfortunately this has not been complied with but developers go marching on. We understand that Mr. Pickles has got a great deal of work in progress but at this rate any help he may be able to give us looks like being too late.

If we are not going to get any satisfactory assurance about the adverse effects of flooding to our homes then we want redress via the European Court of Human Rights because this is not just a matter of regulations or codes of practice not being complied with but natural justice being denied.

We derive no comfort from the Localism Bill because this is a matter of laws not being complied with or even fully or properly implemented.

Yours sincerely,
Robert Craggs
Mrs. Mollie Howes

Cc Rt. Ho. Eric Pickles; Ms. Chloe Smith MP. Mr. P.kirby CEO Broadland District Council

Section 6:

Letter to Ria Morodore of Defra dated 23 October 2012 entitled Flood Risk Sprowston and Broadland Norfolk.

The email referred to in the first paragraph is not attached but one can read from the letter that the suggestion of making a formal complaint against the Local Authority gives a new air completely to buck-passing when the problem

is ineffectual policies. Examples of this ineffectiveness make up the body of the letter and the conclusion is in the penultimate paragraph.

[REDACTED]

Ria Morodore Customer Contact Unit

Defra

CCU 4th Floor

Ergon House

Horseferry Road

London SW1P 2AL

T 08459 3335577

23 October 2012

Dear Ria Morodore

Flood Risk Sprowston and Broadland Norfolk

I am replying to your letter of 17 October 2012

Of necessity this letter is lengthy because I want the facts referred to the highest authorities in Defra and CLG for the long sought inquiry needed.

None of the correspondence from Defra has been helpful in any way and it seems to me that you still do not comprehend the concerns that have been raised and clearly described many times. Merely repeating what the law states is meaningless when the issue is one where law has not been complied with.

To refer me to the Local Government Ombudsman if I am still unhappy adds insult to injury and you would understand this if you saw the outcome of previous complaints against local authorities and the unresolved serious complaint against the LGO. The LGO lacks credibility and I am grieved to say integrity too, the latter being an unresolved complaint made to Sec. of State for CLG. The LGO may produce apologies but that is meaningless when action was required.

We have seen a lot of development around here and have relied on previous assurance from Defra but in vain so I wish to escalate this matter.

You state in your last letter, quote: "As you know the Floods and Water Management Act (2010) gives unitary and county councils responsibility for flood risk management". Of course I know this, just as I know what the requirements of Planning Policy Statement 25: Development and Flood Risk December 2006 states and these requirements are extant they have not been revoked. The problem is that they have not been complied with for the reasons I have previously stated. This renders one Flood Risk Assessment void and throws into question the validity of the Strategic Flood Risk Assessment that my District Council states has been carried for the Joint Core Strategy covering my area that they have named the North East Growth Triangle.

I have repeatedly stated that the senior executives at both District and County Councils have prior to, and since the Floods and Water Management Act (2010), claimed that the Environment Agency has 'approved' developments where we have had concerns about flood risk including actual incidents of flooding but the Environment Agency has denied giving such approval. In any case none of these authorities took into consideration local anecdotal reports and evidence of flooding which is a clear requirement of the 2006 regulations.

Furthermore I am informed by the Environment Agency that aspects of these 2006 regulations were not implemented and I still want to know why when this was the very assurance we were given by the Environment Secretary. To put these concerns into perspective again and for you to understand the sequential failures to address them even when legislation is passed. Please see:

1. Letter dated 1 November 2006 addressed to The Environment Secretary Rt. Hon. David Miliband and copied to my MP at the time Dr. Ian Gibson who asked me to compose the letter that he supported. I think that this letter clearly articulates and bears out legitimate concerns

2. Letter dated 15 December 2006 ref 277144/JH From Mr. Ian Pearson MP Defra to my MP Dr. Ian Gibson. I think that this letter is crystal clear in serving the purpose of giving the assurances sought in 1. above.

3 Letter dated 25 June 2007 entitled Flooding on Home Farm to Colin Bland the then CEO of Broadland DC; Phil Kirby his successor but then Strategic Director Community Services BDC; Mike Jackson Dir. Planning & Transportation Norfolk County Council; Adrian Gunson Cabinet Member Planning & Transportation NCC; June Hunt Clerk of Sprowston Parish Council; Stuart Rickards Planning Liaison Officer Environment Agency and my MP Dr. Ian Gibson. This letter leaves no one in any doubt about the problem of flooding and flood risk by providing specific detail – including a prescient comment about constructing a reservoir! So you will hopefully

understand the disdain I hold for your suggestion about taking my concerns to the Local Government Ombudsman. If this letter does not clearly convey to all concerned, local anecdotal evidence of flooding that is required to be taken into consideration under the requirements of PPS 25 Dec 2006, then I cannot conceive of what would. Notwithstanding none of these authorities took this evidence into consideration for the Millard Consulting FRA carried out for Persimmon Homes Ltd., Hopkins Homes Ltd., and Taylor Wimpy Ltd. The Millard Consulting FRA was flawed in any case because it does not fully understand the significance of the surface water draining from the huge area of North Sprowston into the area proposed for development.

4. Statement dated 7 November 2007 by me to Broadland District Planning Committee regarding application 20070346 that clearly describes the ineffectiveness of District Council, County Council and Environmental Agency liaison as if affects residents and the degree of scrutiny and proof to make a point that should not need making. Since outline planning approval for this particular development had been given prior to the implementation of PPS Development and Flood Risk Dec 2006 it was deemed that these guidelines or regulations were not mandatory, which goes somewhere to showing a lack of conviction at least for the spirit of the law. This letter also illustrates the convenient malpractice of Councils claiming that the Environment Agency 'approved' developments such as the flawed FRA done by Millard Consulting, for example:

5. Letter dated 16 September 2011 to Mr. Phil Kirby CEO Broadland District Council cc Ms.Chloe Smith MP, Cllr. Bill Couzens and Clerk of the Parish Council June Hunt. Again this cannot be any clearer in what it states but it also reveals what the real problem has been all along which is the failure to listen to anecdotal evidence when it is a legal requirement to do so. There is a considerable amount of documentation on this total issue of flood risk and environmental sustainability in the context of the very controversial Joint Core Strategy.

These concerns about flood risk relate to large and contiguous developments are within an area referred to as the North east Growth Triangle (NEGT) which is central to the now notorious Joint Core Strategy that Broadland District Council and the Greater Norwich Development Partnership have tried to force through in the teeth of very strong public opinion and legal ruling. North Sprowston, which is the very focus of my precise concerns for over a decade, is the epicenter of this NEG. It follows that a Strategic Flood Risk Assessment cannot have any credibility if FRA's are not carried out properly and the legal requirements have not been fully implemented.

You cannot relegate these matters to a Local Government Ombudsman as a convenient shunting yard and the statements from the office of the Secretary of State CLG to the effect that they cannot get involved in local planning matters is absurd when flooding is such a major issue nationally and the causation of which is more to do with over-development than anything else.

I am at your service to provide further assistance for the necessary, thorough and belated investigation called for in this matter.

Yours sincerely,

Robert Craggs

Cc Rt. Hon Eric Pickles Sec of State C&LG

Mr. Richard Benyon Defra

Ms Chloe Smith MP

Mr. Phil Kirby CEO Broadland District Council

Mrs. June Hunt Clerk Sprowston Town Council

Mrs. Mollie Howes Resident

Section 7:

Letter dated 16 December 2012 Flood Prevention Sprowston NE Norwich
by Recorded Delivery to the Prime Minister and the Deputy Prime Minister
This was to prove to our leaders that legislation/policies or successive Acts of
Parliament were not working. These 46 items of showed where the problems
were and where action was needed.

[REDACTED]

To: Prime Minister David Cameron, and

Deputy Prime Minister Nick Clegg. By Recorded delivery

cc: E-mail: Ms. Chloe Smith MP with Appendices

Rt. Hon. Eric Pickles with Appendices

16 December 2012

Dear Mr. Cameron and Mr Clegg,

Flood Prevention Sprowston NE Norwich

Cooperation from Taxpaying Clients of Insurers

We are aware that the Government is involved in negotiations with Insurers regarding flooding. Since the aim of the exercise is the protection of insured home-owning/renting taxpayers, we feel that we can make a valuable contribution to the entire issue by preventing flooding occurring by providing local knowledge. However, having been repeatedly ignored by Local Government and the Environment Agency, both of which pass the buck with alacrity when it comes to responsibility, we have been unable to get any assistance from Defra, CLG or yourself. Therefore we feel that as clients, a direct approach to the Association of British Insurers may produce a more positive reaction.

We have considerable experience of how local government, developers and the Environment Agency operate without real effectiveness in this area where anecdotal evidence, that can prevent a great deal of flooding, is disregarded. Among other things we will be recommending to the Insurers that anecdotal evidence of flooding becomes a more transparent legal obligation in the process of approving Flood Risk Assessments. For Government to assume that proper assessment of flood risk required Development and Flood Risk policies takes place is an error.

The 46 items of correspondence in the index of appendices is attached to indicate the extent of communications on this subject covering a decade and a mere glance at this will indicate our earnestness in this matter. We would add that our MP Ms. Chloe Smith, like her predecessor Dr. Ian Gibson have both been quite involved and have been as helpful as we could expect, but still little, if any notice has been taken of what we have reported and we are sure that development on the scale that is planned can only increase flood risk even more.

Our purpose is not to interfere but to alert authorities and insurers to a flood risk problem against which we have sought assurances but since this has not been forthcoming, in fact it has been positively refused, we want to ensure that responsibility is laid at the door of those who we consider have failed us and so that we do not suffer adverse consequences as a result of being ignored.

Yours sincerely,

Robert Craggs.

Residents Representative.

Section 8:

Letter of reply dated 15 January 2013 from office of Secretary of State Rt

Hon Eric Pickle replying to letter of 16 December 2013 to Prime Minister and Deputy Prime Minister.

[REDACTED]

Our Ref: TO-000300/13

[REDACTED]

Your Ref:

[REDACTED]

[REDACTED]

15 January 2013

[REDACTED]

Dear Mr Craggs,

Thank you for copying to the Secretary of State, the Rt. Hon. Eric Pickles MP, your letter of 16 December to the Prime Minister and Deputy Prime Minister informing them that you are taking up your concerns about flood prevention in Sprowston with the Association of British Insurers. I have been asked to reply on behalf of Mr Pickles.

I note your comments, including your concerns about the conduct of flood risk assessments which you have expressed in previous correspondence. In this respect I do not think I can add substantially to our previous replies to you on this matter. It remains the case that it would be inappropriate for this Department to comment on specific planning applications or the policies in emerging local plans, or to become directly involved in planning matters which are properly the responsibility of the democratically accountable local council.

You have referred to the Government's development and flood risk policies and for clarity I should explain that these policies are now set out in the National Planning Policy Framework that we published last March, together with accompanying Technical Guidance. These carry forward the same general policy approach to development and flood risk that was previously set out in Planning Policy Statement 25 (PPS25). The Framework and Guidance can be viewed at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> ; and

<https://www.gov.uk/government/publications/national-planning-policy-framework-technical-guidance> .

Like PPS25, the Framework is not a 'regulation', but its policies must be taken into account in the preparation of local plans, and it is a material consideration in planning decisions.

You may also be interested to know that a review group led by Lord Matthew Taylor has recently reported on how we should streamline existing planning practice guidance issued by the Department (and its predecessors). In doing so, they have made recommendations on the practice guidance they consider is needed to support effective implementation of the National Planning Policy Framework. One of these areas is flood risk where they have recommended the existing guidance is streamlined and brought up to date. We are currently consulting on the report's recommendations and the consultation is open until 15 February – see: <http://planningguidance.readandcomment.com/>.

We also appreciate the need for affordable insurance for homes at risk of flooding. There is currently an agreement between the Government and the insurance industry, called the 'Statement of Principles', that obliges insurance companies to offer flood cover as part of standard policies in most cases, but the price of insurance remains a commercial decision for insurers. The existing agreement is due to expire on 30 June 2013. Looking beyond that date, the Government is currently considering with the industry's support a way of formalising existing pricing arrangements. Further information about these discussions can be found on the web site of the Department for Environment, Food and Rural Affairs at: <http://www.defra.gov.uk/environment/flooding/funding-outcomes-insurance/insurance/>.

Yours sincerely,

Martyn Mance

Section 9-

Letter dated 9 February 2013 to Martin Mance of DCLG (ref 000300/13)

This relates to failure to dispense guidance and even passing the buck first to locally elected councillors who did not approve the said FRA because it was passed/approved/accepted under Reserved Matters then the suggestion for it to go to the Local Government Ombudsman. In short a very unsatisfactory situation that gives a good insight into where the country inexorably experiences more flooding each year from development where clearly FRA's drawn up by developers effectively goes unchallenged



[REDACTED]
[REDACTED]
[REDACTED]

Mr. Martin Mance,
DCLG
Planning- Infrastructure and Environment
Zone 1/J5, Eland House,
Bressenden Place
London SW1E 5DU
Tel: 0303 444 1690

[REDACTED]

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Your Ref: To-000300/13

9 February 2013

Dear Mr. Mance,

Thank you for your letter of 15 January 2013 that I have circulated to those concerned.

I am certainly interested to know that Lord Matthew Taylor has recently reported on how we should streamline existing planning practice issued by your department and predecessors. It would have been considerably more interesting to have known about this before the report was drawn up because I would have majored on the point of development and flood risk policies being implemented properly, before thought was given to streamlining the planning process.

A veritable plague of refusing accountability seems to permeate everywhere. The DCLG has repeatedly refused to assist us and instead keeps churning out the rules without even thinking about compliance and who is supposed to do what. Where have we heard this before, or more aptly, how many times have we heard it?

We now hear a call for candour to be legislated for in our hospitals. Candour, aka "telling it as it is", has been a fundamental requirement all of my professional life, though legislating for it was never required because the sanction of the time honoured tradition of 'the sack' obviated the need.

I will therefore be candid with my comments.

I have been aware of the Government's policies on development and flood risk for some time. Similarly I have been aware of the previous Governments policies on development and flood risk since inception in December 2006 as I have been at pains to explain to you. I was aware of the lack of such policies some years prior to this when I was seeking assurances about flood risk resulting from development. This brings me to stating again that if we cannot be protected by the proper compliance with these policies, we want to be compensated for any adverse effects of flood risk. That this has been formally denied us by a Chief Executive of a District Council, who has failed to protect our interests, yet who refuses to explain who approved the flood risk assessment is not satisfactory.

The DCLG does not seem to comprehend our concerns about lack of compliance with such policies, hence in the letters to the Prime Minister and Deputy Prime Minister. And now our desperate decision to write to the Director General of the Association of British Insurers about the failures of Local and National Governments to take effective action on these policies. We see the ABI as taking a far more responsible attitude to flooding than anyone in Government and since preventing or reducing the risk of flooding should be in everyone's interest.

You have previously suggested taking this matter to the Local Government Ombudsman which we consider to be absurd and for me ranks as the most lamentable example of buck passing I have ever experienced.

For the record, I must point out again that what you state as should be taking place. is not taking place. Similarly, when you state that Flood Risk Assessments are the responsibility of the democratically accountable local council, you ignore the reality of responsibility acceptance. We cannot find out who approved this FRA though we are very familiar with the buck passing process. The Chief Executive of Broadland District Council has previously told us the it was approved by the Environment Agency, but as I have explained ad nauseam, the Environment Agency state that they did not approve it and only approve matters relating to flood risk where rivers and the sea are involved.

Confronted with these facts the Chief Executive then decides to adopt another position stating that "no one person" approves a FRA but still will not tell us who so this is cannot constitute the democratically accountable process you describe. The FRA was not approved by elected Councillors, I can only assume it was a Reserved Matters item but the CEO will not say, instead he refers me to someone who says that he is unable to comment on the FRA because he does not understand it, though the primary question was who did approve it?

Since we have submitted detailed anecdotal evidence of flood risk we consider it to be a fatal flaw in the process if it is ignored but no one wants to comment on this, why? We would expect local knowledge to be taken into account given that it has been repeatedly stated in correspondence to all authorities involved, as you know. This is where streamlining something that never took place could be another flaw. What you never seem to tire of is

writing policies, presumably when you eventually realize no one is taking any notice you will want to appoint another inspector.

Yours Sincerely,

Robert Craggs

Cc Rt. Hon Eric Pickles Sec of State CLG

Ms. Chloe Smith MP Norwich North

Mr. Otto Thoresen Director General ABI