

Broadway Farm – Application LDC/23/95111

I have looked at the historical aerial photographs of the area available in Google maps, and that does not appear to support the claims that Grasscrete was installed in 2006. I have attached the photos in chronological order that they are available from Google maps. The date that they were taken (imagery date) is shown in the bottom right hand corner.

My conclusion from the photos and information in the previous planning applications:

- There is no evidence of Grasscrete in the area from the historical photos
- There is no evidence of regular continued use of the area for the storage of vehicles
- The test holes cut in the tarmac does not show Grasscrete
- It is stated in the earlier planning applications that this area was for the sole use of NHS vehicles, and that is contradicted in the supporting information to this application that says that the area was and is for the use of heavy vehicles, so the justification seems to be adapted to perceived best support for application requirements at the time.
- The planning application F/22/94108 proposed to remove this area of tarmac as it contravened environmental regulation as this tarmac area was too close to the adjacent wood which was a protected SINCE environment, and there should be a buffer of at least 20m. This planning application included a proposal to remove the tarmac area for that reason. I cannot see why this requirement would not still apply.
- This area of tarmac (and others) was installed without planning permission in late 2020, so less than 4 years ago. Even if it is accepted that the Grasscrete was already there (which I do not), the tarmac is a significant change to the character of the area, so should not be accepted. There have been several planning applications to expand the site and incorporate this area of tarmac, all of which have included a requirement to provide holding for the increased water run off. This application does not, and I can see no reason why that requirement would not still be applicable.

Please note the following from the aerial photos:

- There is no discernible difference between the grass appearance in the area in question and the rest of the field in the photos pre and post 2006 when it is stated that the Grasscrete was installed. I would expect that the weed control fabric and the hard core would suppress the grass, and that there would be a difference in appearance. There is a photo from April 2007, which is less than a year after the Grasscrete was stated to have been laid, but the whole field has a similar appearance. Grasscrete has a very distinctive cellular pattern with pockets of soil, and that should be clearly visible this soon after it was laid (see photos from Grasscrete website below).



- The photo from Aug 2016 clearly shows tyre tracks going from the entrance 1/3rd way up the field to the area in question. These tracks look the same in the field, and I would not expect to see them in an area with Grasscrete.
- I would draw your attention to the photo taken on 6th May 2020, which is shortly before the tarmac area was laid. Exhibit 4 states that the area needed to be repaired because *"the 14 year old grasscrete required repair and some maintenance given the heavy loads had damaged the grasscrete in places"*. This photo was taken just before the tarmac was installed, and not only is there no indication of a change of grass growth or Grasscrete which has a very distinctive cellular pattern with pockets of soil, but there is no evidence of the damage that apparently required the tarmac.
- I note that only one of the photos has a few trailers, but there are no other vehicles in any of the photos before December 2020 when the tarmac area was added. This suggests occasional use at best.
- There was a hedge / trees/ buildings separating the working site from the area in question, with the access much lower down the site. The photos from 2019 and May 2020 (after much of the expansion of the site with new building work) show that a new hedge was planted which separated the working site from the field. If the area in question was in regular use, then I would expect there to be an access to it. It is only when the new tarmac area has been installed in late 2020 that the access from the top of the working site is made. This suggests that the area has only come into regular use since the new tarmac was laid.
- In Exhibit 4 of the application it was stated that before the Grasscrete was installed there were problems with vehicles / trailers having problems in soft and muddy ground. I would expect that the worst area for this would be at the entrance to / from the area, as this gets the most use. However, the photos show that there was no direct access to the area in question because hedges / trees separated the working area from the field, until the new tarmac was laid in late 2020. If the Grasscrete area prevented problems with mud, then you would put an access directly to it, but that was not done, so they would still have problems with mud / soft ground at the access point without Grasscrete in wet weather, so the area would be of no benefit.

I have read the application document and have the following further comments:

- Run off from hard surface. Note that in the previous planning applications F/21/91859, F/22/93195 & F/22/94108 included this area, and in those it was considered necessary to provide a system to hold the run off water generated by this area. I note that this is not part of this application, and have concerns that the water run off is likely to continue to create problems with the known issue of flooding of the main road adjacent to the site.
- The planning application F/22/94108 included an objection from the council on environmental grounds that this tarmac area was too close to the adjacent wood which was a protected SINC environment, and there should be a buffer of at least 20m. The Planning Statement in that application included the statement:

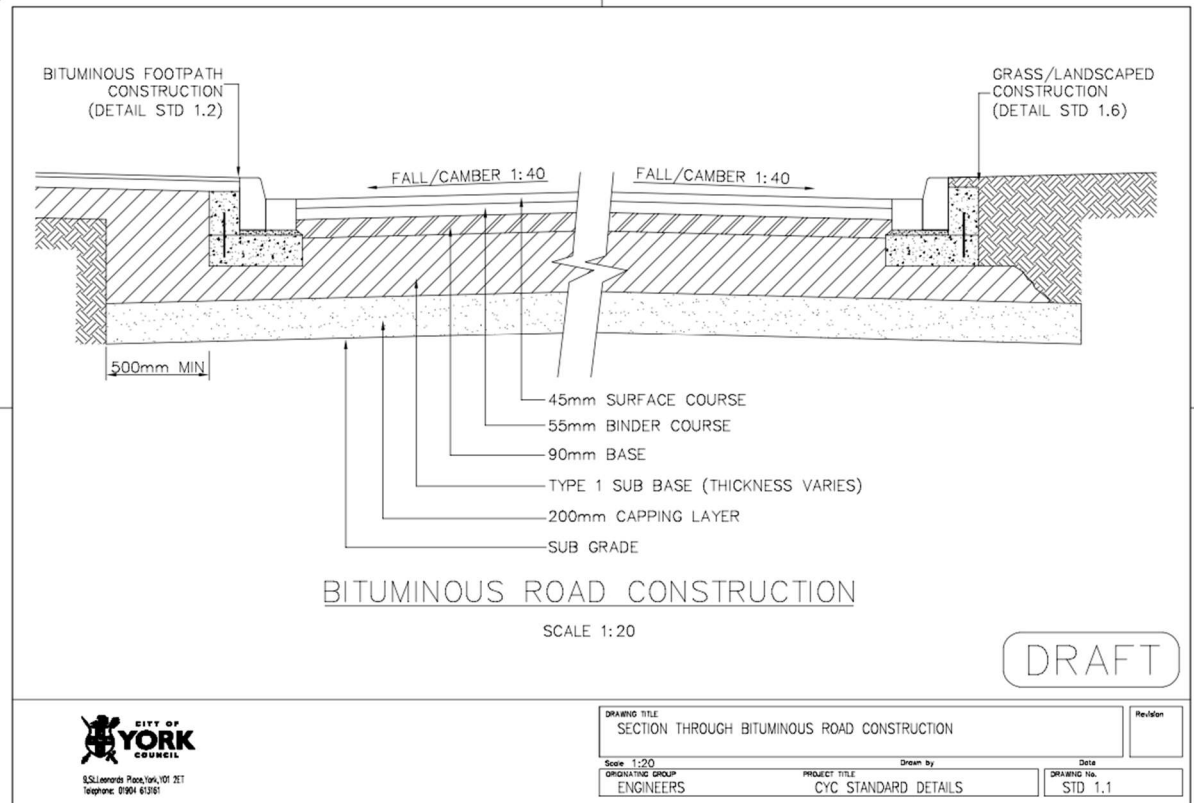
"The main issue outstanding from the latest application arose from the Council's Ecologist in which it stated that the absence of a 20m buffer from the SINC was an absolute requirement. The resultant technical work required a review of the parking apron to remove it from the SINC area to the west, creating an opportunity to remove the existing apron and replace it with an ecological enhancement area to complement the SINC."

I do not understand why this no longer applies, as this area of tarmac has been laid without any planning approval.

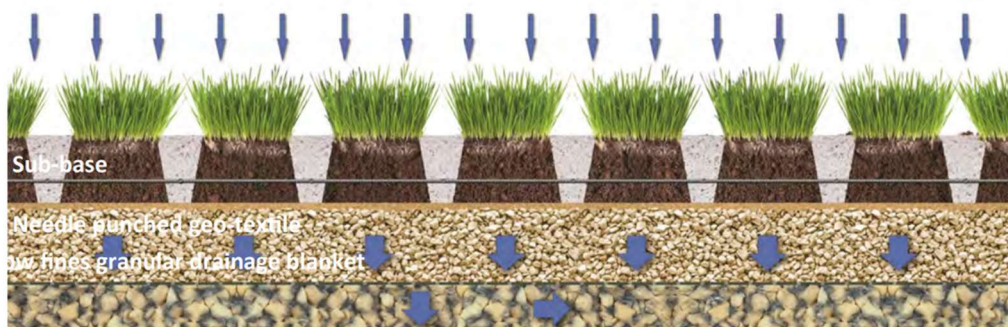
- In application F/21/91859 it was stated that this area was solely for the storage of NHS ambulances at a concessionary rate. There is no mention of that in this application, and it states to the contrary that this area was put in place to ease the storage and parking of large trailers.
- I note from document "230424 F Louisa Doe Statement of Declaration - V1.pdf" that the vehicle licence has changed dramatically from 7.5 tonne trucks to 44 tonne trucks. Justification for the increase is given in that adverts have been placed in the local paper and

no objections have been made. It would require everyone to have a subscription to the Daily Echo, and to avidly read the classified advert section to search for possible notices that might affect your area. This seems a flimsy basis on which to state that there are no objections to both an increase in the volume and size/weight of heavy goods traffic.

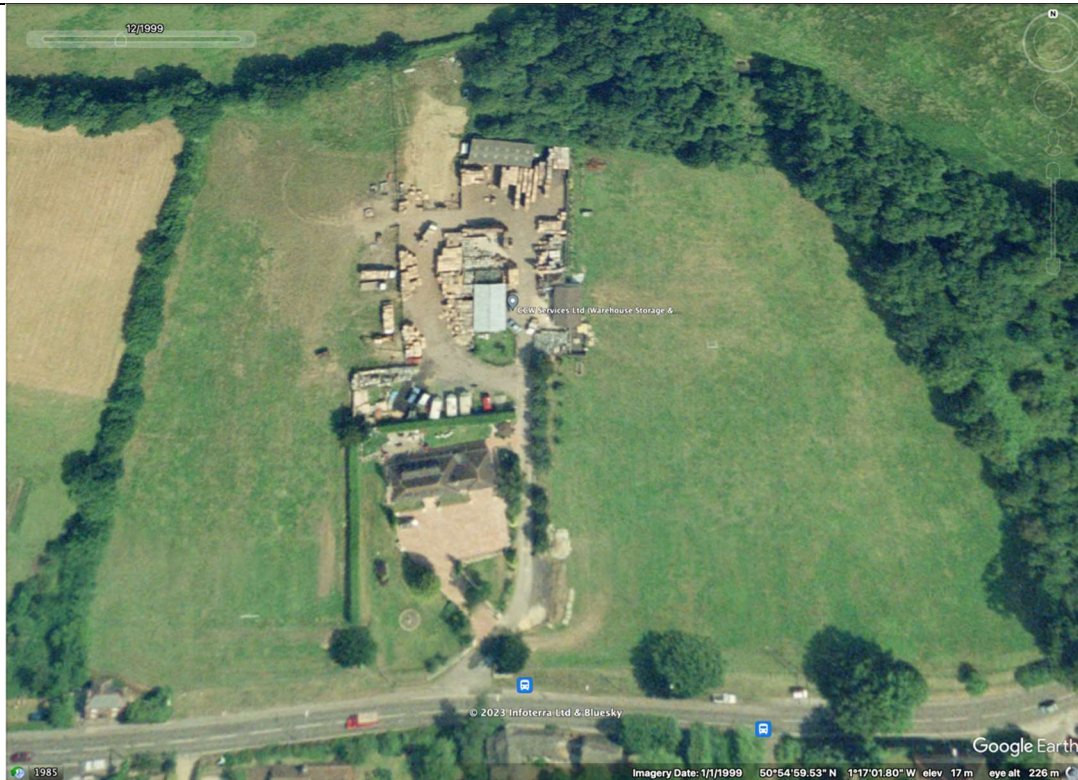
- The change from 7.5 tonne to 44 tonne trucks began in Aug 2016, prior to which they only had a licence for 6 vehicles, so it is not clear why they had the need for continuous use of the area in question for the parking of heavy vehicles from 2006 as claimed.
- The 4 test holes made do not support the claim that Grasscrete was installed in 2006. The photos are not very clear, but what it looks like is a good quality system that would be used to create a tarmac parking area over a grass field. To lay tarmac you build up a system of layers to give good foundations – see typical construction below:



- What is shown in the photos looks like a section through this type of construction, with the stones embedded in the asphalt cut through with a disk cutter. I can see no evidence of the concrete Grasscrete in the holes. Each photo shows a continuous layer of thick material, below which is the compacted hardcore. Grasscrete has a distinctive cellular structure with, a metal reinforcing mesh, and soil pockets, none of which is visible in the photos of the excavations. The photo below is taken from the Grasscrete website, and shows a section through the Grasscrete.



- It is clear that the photos in the application look nothing like this. There is no soil, and there are no gaps.



Aerial view taken on 1st Jan 1999.

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete.

Note that there are hedges and trees separating the field from the working site, with the access from the bottom near the main road.



Aerial view taken on 1st Jan 2005.

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete.

Note that there are hedges and trees separating the field from the working site, with the access from the bottom near the main road.



Aerial view taken on 21st Apr 2007.

This is after it is stated that the grasscrete has been installed (in 2006)

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. Grasscrete has a very distinctive cellular pattern with pockets of soil, and that should be clearly visible this soon after it was laid.

Note that there still are hedges and trees separating the field from the working site, with the access from the bottom near the main road.



Aerial view taken on 2nd Feb 2012.

This is after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. I would expect grasscrete with the weed control barrier, and hardcore stated to have been installed to make a significant reduction in grass growth, particularly as other areas of the photo indicate that it was dry, but there is no change in the grass, which if anything is growing more strongly than in other areas of the field. Note that there are still hedges and trees separating the field from the working site, with the access from the bottom near the main road.



Aerial view taken on 22nd Sept 2014.

This is after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. I would expect grasscrete with the weed control barrier, and hardcore stated to have been installed to make a significant reduction in grass growth, particularly as other areas of the photo indicate that it was dry, but there is no change in the grass, which if anything is growing more strongly than in other areas of the field. Note that there are still hedges and trees separating the field from the top of the working site, with the access from around 1/3rd of the way up from the bottom near the main road.



Aerial view taken on 22nd Apr 2015.

This is after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. I would expect grasscrete with the weed control barrier, and hardcore stated to have been installed to make a significant reduction in grass growth, particularly as other areas of the photo indicate that it was dry, but there is no change in the grass, which is showing similar signs of wear to other areas of the field. Note that there are still hedges and trees separating the field from the top of the working site, with the access from around 1/3rd of the way up from the bottom near the main road.



Aerial view taken on 12th Aug 2016.

This is 10 years after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. I would expect grasscrete with the weed control barrier, and hardcore stated to have been installed to make a significant reduction in grass growth. There are clear tracks from the access to the field about 1/3rd of the way up the field. These tracks are clearly visible in the area which was stated to have been covered with grasscrete, which is a strong indication that the whole field is grass soil of a similar consistency. Grasscrete has a very distinctive cellular pattern with pockets of soil, and that should be clearly visible, and should not show tyre tracks.



Aerial view taken on 15th Sept 2019.

This is years after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. I would expect grasscrete with the weed control barrier, and hardcore stated to have been installed to make a significant reduction in grass growth. There is no indication of a change of grass growth or Grasscrete which has a very distinctive cellular pattern with pockets of soil. Note that there are still hedges and trees separating the field from the top of the working site, with the access from around 1/3rd of the way up from the bottom near the main road.

The photo also shows the start of the major building program on the site.



Aerial view taken on 6th May 2020.

This is years after it is stated that the grasscrete has been installed (in 2006).

The area in question is in the top right hand corner, and the whole field has a similar appearance, suggesting that it is just grass, with no grasscrete. Exhibit 4 states that the area needed to be repaired because *“the 14 year old grasscrete required repair and some maintenance given the heavy loads had damaged the grasscrete in places”*. This photo was taken just before the tarmac was installed, and not only is there no indication of a change of grass growth or Grasscrete which has a very distinctive cellular pattern with pockets of soil, but there is no evidence of the damage that apparently required the tarmac. The photo also shows that a new hedge has been planted so there is no access to the area in question from the top of the site, and the previous access 1/3rd of the way up the field has been closed off. This suggests that the area was not in regular use.

The photo also shows the continued major building program on the site.



Aerial view taken on 24th Dec 2020.

The area in question is in the top right hand corner, and the tarmac looks very freshly laid.

The photo also shows an opening has been made in the new hedge to provide access to the area in question from the top of the site, that was not previously there. This suggests that the area is only now coming into in regular use.

The photo also shows the continued major building program on the site, with extra large buildings and additional non porous tarmac.



Aerial view taken on 21st Mar 2022.

The area in question is in the top right hand corner, with vehicles on the area.

The photo also shows an opening has been made in the new hedge to provide access to the area in question from the top of the site, that was not previously there. This suggests that the area is only now coming into in regular use.

The photo also shows the continued major building program on the site, with extra large buildings and additional non porous tarmac over areas that were not previously covered.