

From: Simon Davis

Sent: 04 February 2020 15:32

To: Nigel Jarvis [REDACTED]

Cc: Sarah Armit [REDACTED]; Joe Godfrey [REDACTED]; Graham Beck [REDACTED]; Charlotte Hardy [REDACTED]

Subject: RE: Information included within flood extent mapping layers

Dear Nigel,

I think the reason why you cannot find anything in our report regarding the Cottage, Shripney Road site is because this was not considered on that application. As I think I had previously mentioned, we as officers were not full up to speed on the need to consider future flood risk (and the need for a sequential assessment as per the NPPF & PPG) until last July when the issue of future flood risk was picked up in respect of two crematorium applications. Since then, the issue has come more to the fore. However, in determining BE/69/19/OUT, regard was had to the presence of the earlier extant outline consent (BE/63/17/OUT) which was decided at a time when future flood risk was not considered, and as such future flood risk was not considered.

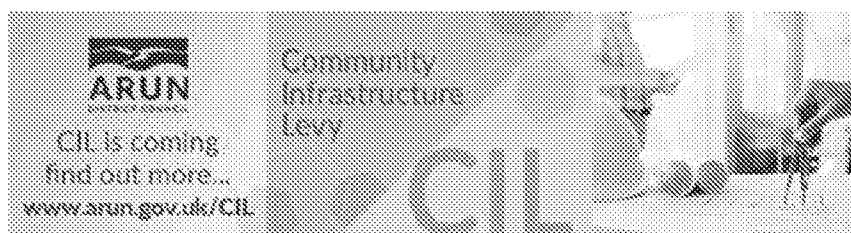
Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |

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Please note that I typically work from home on Thursdays when I am unreachable on my work phone



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Save the environment - think before you print.

From: Nigel Jarvis [REDACTED]

Sent: 30 January 2020 19:03

To: Charlotte Hardy [REDACTED]; Simon Davis <Simon.Davis@arun.gov.uk>

Cc: Sarah Armit [REDACTED]; Joe Godfrey [REDACTED]; Graham Beck [REDACTED]

Subject: Re: Information included within flood extent mapping layers

Charlotte,

Thanks for the email and your time today on the call. Ramboll will review and respond.

Simon (Charlotte FYI),

Ramboll are confident that the site is only affected as shown in the FRA. i.e. not by tidal flood risk, but will set about responding further to clarify this and provide you with the necessary confidence about the site and proposed land use.

Charlotte was unable to comment on other applications. Understandable given her role, but I wonder if you can provide your interpretation in light of the following?

While I can agree with her point that sources of flooding that affect a site should be included in a sequential test (setting aside previous conversation on how one scopes that if it is just a very small area of a site), I think it follows that those sources that do not should not be included. You would not review tidal flooding in Northampton for example. In this case I want to check that the treatment of undefended tidal flooding isn't a point of inconsistency.

Our submitted FRA already sets out the reasons why 'undefended tidal flooding' as a source (per the FRA) can be discounted from consideration as a source in its own right. This would now appear to me to be consistent with the case (determined in October 2019) of 'The Cottage' BE/69/19/OUT where the Council accepted a similar conclusion reached in the Hilson Moran FRA (section 4.4.3.1 ADC SFRA Flood Map and EA Product 4 Flood Map – Riverine and Tidal Flooding) that reliance could be placed on the Defended tidal scenario (which removes that site from flood risk in 2115) owing to the EA's commitment to maintaining the level of flood protection currently provided. Despite that site being shown in future years to be affected by flooding (within Zone 3a) by the SFRA Climate Change Mapping the FRA neither included a Sequential Test, not can I find one was requested or submitted? The officers report does not clarify as it does not make any mention of such or any concerns with flood risk.

In that case the Council did not seem to have an issue with separating out the 'undefended tidal' scenario or that the FRA did not have a sequential test.

If I have missed something or it isn't online I am sure you will set me straight of course but it is certainly valid to ask and I want to ensure there is consistent application of requirements.

Kind regards,

Nigel Jarvis | MRTPI | Director

