
FW: BR/24/26/PL Tesco - SUB PLAN REQUEST

From Simon Davis <Simon.Davis@arun.gov.uk>

Date Mon 01/06/2026 13:17

To Planning.Responses <Planning.Responses@arun.gov.uk>

 3 attachments (19 MB)

30268440-ARC-P01-XX-TR-DH-00002_P04 - Flood Risk Assessment.pdf; WSCC Highways - Transport Technical Note Response - 2501-044 TN03_May 26.pdf; Table setting out responses to EA comments within the revised FRA.pdf;

Hi,

Please:

- Supersede IDs 9,10, 11, 53, 54 and replace them with the attached “30268440-ARC-P01-XX-TR-DH-00002_P04 - Flood Risk Assessment”
- Add the attached “WSCC Highways - Transport Technical Note Response - 2501-044 TN03_May 26” as an additional document
- Add the attached “Table setting out responses to EA comments within the revised FRA” as an additional document

Issue 14-day reconsults to WSE and EA with amendment text “Revised FRA and new Highways Technical Note”

Thanks
Simon

From: Nathan Wilso [REDACTED]
Sent: 01 June 2026 11:37
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Harriet Humphrey [REDACTED]
Subject: RE: BR/24/26/PL Tesco

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Good morning Simon,

I hope you are well.

Please find attached our responses to WSCC Highways comments, along with the revised Flood Risk Assessment prepared in response to the Environment Agency's comments.

For clarity, I have included the table below summarising the EA's comments and indicating where each corresponding response can be found within the FRA. The full document is attached under reference 30268440-ARC-P01-XX-TR-DH-00002, Revision P04.

Consultee	Consultee Comments	Where to find within revised FRA
EA	The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere.	
	While we are happy to see the loss of floodplain storage has been reduced, sufficient information has not been provided to detail the proposed development and its impact on flood risk.	
	At meetings held in 2025 the applicant proposed an area of floodplain compensation to the north-east of the existing filling station. This area was above the design flood level and potentially suitable to provide level for level floodplain compensation. No information has been provided on why this approach is no longer suitable. The design submitted with this application proposed excavation of the existing car park below the design flood level. A provision of storage in this location would only provide compensation for flood events that reach a level of 1.17 metres AOD and above. Any flood event below 1.17mAOD would not benefit from the design compensation.	See section 6.1
	Furthermore, no detailed drawings or comparison sections have been provided for the excavated area of the car park or steel posts to show the volume lost against the volume gained. Figure 6.1 of the FRA states that 'it is estimated that the posts supporting the deck would potentially displace approximately 1.5-2m ³ '. This is also stated to be an initial design which is subject to further development. It would not be possible to condition this design as it is not final.	See section 6.2 and Appendix C
	We also note that while Figure 6.1 of the FRA shows an extract of 164842-PC-0200-E-Flood Compensation.pdf , we have not been able to find this document in those submitted and therefore have not been able to review it as part of this consultation.	See Appendix C (updated revision, Rev G)
	Section 6.2 Floodplain Storage of the FRA states that a maintenance plan will be prepared and ensure that any debris/silt buildup underneath the deck is cleared remotely using a robot on an annual basis and following a flood event. However, this maintenance plan has not been supplied as part of the application. Given the nature of the design, it will be of critical importance to ensure the area under the deck is clear and available to store flood water in a flood event. This will need to be conditioned as part of any planning permission for the development. Without a submitted, final maintenance plan, it will not be possible to condition the future maintenance and condition of the design.	See section 6.2 and Appendix D

I apologise for the delay in returning to you regarding the Drainage and LLFA responses. We are working to finalise these as soon as possible, and I will provide a further update on timescales for issuing these shortly.

I trust the above is clear, however should you have any queries, or wish to discuss, please do let me know.

Kind regards,
Nathan

NATHAN WILSON
PLANNER

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE



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