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**From:** Simon Davis  
**Sent:** 25 June 2025 12:21  
**To:** 'Gary Morris' [REDACTED]  
**Subject:** BR/97/25/PL The Arcade

Dear Gary,

In our pre-application response, we set out the need for a sequential assessment due to the new built development, but I see you have not provided one instead arguing the scheme is part of the redevelopment of the Town Centre, the scheme is mostly change of use and all new flats are on the upper levels.

However, the NPPG makes it clear that the floor level of the accommodation should not be considered. In addition, there is no exemption for urban redevelopment and there is no exemption if new built development is proposed.

We have an application in at present for the site next door (17 High Street) which proposes a change of use and extensions to facilitate conversion to residential flats (and retaining some retail floorspace). They have also not provided a sequential and we have asked them to withdraw and resubmit with an assessment, or we will refuse on that basis. We must be consistent in our decision making otherwise we open ourselves up to challenge.

Separately, I have just had an email from our Drainage colleagues over at WSCC (the LLFA) and they have advised *"I've had to object to this application as the FRA is out of date and the issues raised in the pre-app haven't been addressed (in particular safe access and egress). I also noticed that their sequential test bit doesn't mention surface water. We'd already highlighted that all sources of flood risk would need to be assessed in ST."*

I've not yet seen their full comments (not yet on the website) so would recommend you look out for these in the coming days.

Please can you therefore arrange for the submission of a sequential assessment and revised FRA. We are aiming to take this application to our August Cttee for which the agenda closes on 18 July. Therefore, we will need the sequential and other flood related items in good time to allow for its review. Please therefore provide this to us within 14 days of this email.

Kind Regards

Simon

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