

Breezie Allwright

From: Hannah Kersley
Sent: 24 October 2025 10:31
To: [REDACTED]
Subject: FW: P/43/25/PL - Inglenook Sequential Test
Attachments: EIR response - EIR2025_27209.pdf; W1830-f Inglenook Sequential and Exception Test.pdf; D2310 PL006 Flood Map Appraisal.pdf; P-43-25-PL.docx

Hi,

Please can the attached be uploaded to P/43/25/PL. Request form attached.

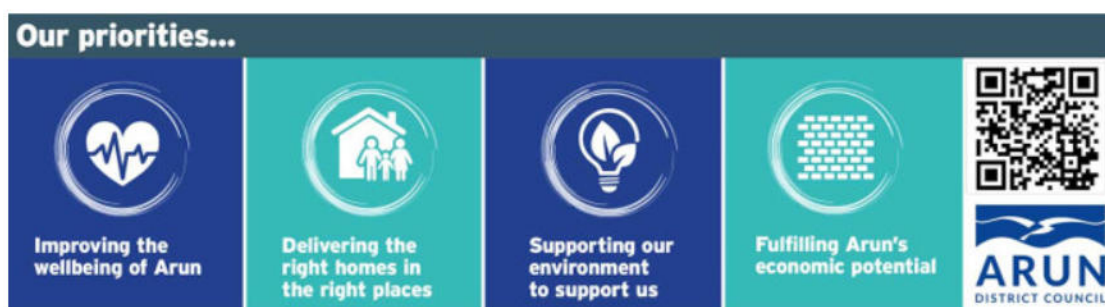
Kind regards
Hannah

Hannah Kersley (she/her)
Principal Planning Officer, Strategic Development

T: 01903 737856
E: hannah.kersley@arun.gov.uk

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From: Kai Penny <[REDACTED]>
Sent: 23 October 2025 16:49
To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: Re: P/43/25/PL - Inglenook Sequential Test

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Hi Hannah

Please find attached EA's latest position on the climate change flood mapping, which was sent to the flood consultants Bright Plan recently. At page 2, they state that "updated flood risk assessment data is not yet publically available" when referring to the climate change mapping which, at the very least, means that flood consultants cannot fully appraise the effect of the climate change mapping until such time that the EA provide accurate, accessible data for this layer.

I have nonetheless prepared the sequential and exception test, alongside an accompanying plan from Bright Plan (please find attached), which the Inglenook site has passed. I have included analysis of the Small Site Commitments as requested, although these have either been built out or had permission granted and so I would have thought these sites cannot be considered 'reasonably available'.

Appreciate this is relatively outside of your control, but when are you expecting the drainage consultee's feedback? The applicant's response was sent over 7 weeks now and they're becoming disillusioned by the delay, particularly as they're hoping for the application to be heard at November Committee so that the development can proceed at pace (if approved).

I am on leave next week, but my colleagues will be monitoring my e-mails should anything need actioning in my absence.

Kind regards,

Kai Penny MRTPI

Senior Planner



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RTPI Planning Consultants

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From: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Sent: Monday, October 20, 2025 3:08 PM

To: Kai Penny <[REDACTED]>

Subject: RE: P/43/25/PL - Inglenook Sequential Test

Hi Kai,

Thank you for bringing this to my attention.

This does raise a number of questions our end, and we would require further robust justification from the EA as to why this is the case. It is very clear from their published guidance through the Flood Map for Planning, and associated Planning Policy Guidance that the 'flood zones plus climate change layer' is to be used to identify the need for the sequential test ([How to use flood map for planning data - Flood map for planning - GOV.UK](https://www.gov.uk/guidance/how-to-use-flood-map-for-planning-data)). As such, if this is not based on any modelled data, then we query how they have mapped these layers, and what purpose there is to having this layer shown on the flood maps if it should not be relied upon.

The Flood Map for Planning serves as our most up to date available flood mapping data. As such, we do rely upon its contents to identify and assess the need for FRAs and Sequential / Exception Tests, especially in respect of future flood risk as this is more up to date than our own SFRA data. It is therefore very concerning that the EA are providing conflicting advice which goes directly against its published guidance.

If you can provide evidence from the EA that the flood zone with climate change layer should not be used, or any modelled data that provides evidence that climate change will not affect the site, then we would reconsider the need for the Sequential Test.

Kind regards

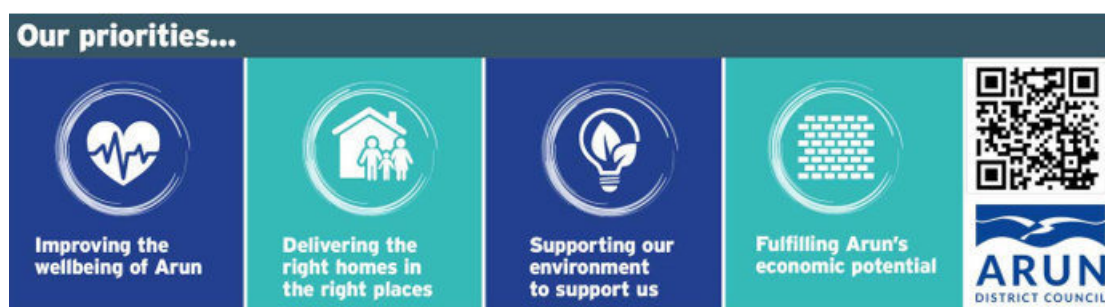
Hannah Kersley (she/her)
Principal Planning Officer, Strategic Development

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From: Kai Penny [REDACTED] >
Sent: 20 October 2025 14:15
To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: Re: P/43/25/PL - Inglenook Sequential Test

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Hi Hannah,

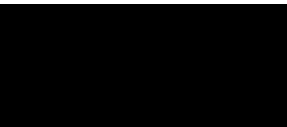
Thank you - that's all clear.

I have just spoken to our flood consultant regarding the sequential test and they have had confirmation from the EA on three separate sites that the climate change flood map should not be relied upon / used for planning as it is not based on any modelled flood data.

I'm not sure if the sites in question were within Arun District, but could this be considered to remove the need for the sequential test if we were to provide evidence of this?

Kind regards,

Kai Penny MRTPI
Senior Planner



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RTPI Planning Consultants

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From: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Sent: Monday, October 20, 2025 1:59 PM

To: Kai Penny <>

Subject: RE: P/43/25/PL - Inglenook Sequential Test

Hi Kai,

I think it may also be worth taking into consideration the Small Sites Commitment within the AMR Appendix 8. Para 028 of the PPG on Flood Risk and Coastal Change does state that alternative sites could be a series of two or more smaller sites, and therefore it would not be that all potential lower risk sites need to be comparable in size to Inglenook. Just so that all options are explored, it would be worth investigating whether there are any reasonably available sites under the AMR which could deliver the quantum of 6 to compare with Inglenook, but across two or more sites.

Other than this, the search scope would be acceptable.

Kind regards
Hannah

Hannah Kersley (she/her)
Principal Planning Officer, Strategic Development

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From: Kai Penny <[REDACTED]>
Sent: 17 October 2025 16:08
To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: Re: P/43/25/PL - Inglenook Sequential Test

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Hi Hannah,

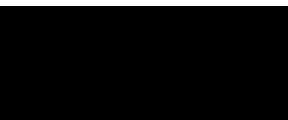
Great, thanks.

I've used the Arun HELAA Mapping System, Brownfield Register and selling platforms to look for alternative sites, whilst disregarding the Small Sites Commitment at Appendix 8 of the AMR (sites for less than 5 dwellings) as it includes sites not comparable in size to the Inglenook

Are you content with that search scope?

Kind regards,

Kai Penny MRTPI
Senior Planner



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From: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Sent: Friday, October 17, 2025 1:01 PM

To: Kai Penny <[REDACTED]>

Subject: RE: P/43/25/PL - Inglenook Sequential Test

Hi Kai,

That's right – I don't think it would be necessary to look any further than those 4 wards.

Kind regards

Hannah

Hannah Kersley (she/her)

Principal Planning Officer, Strategic Development

T: 01903 737856

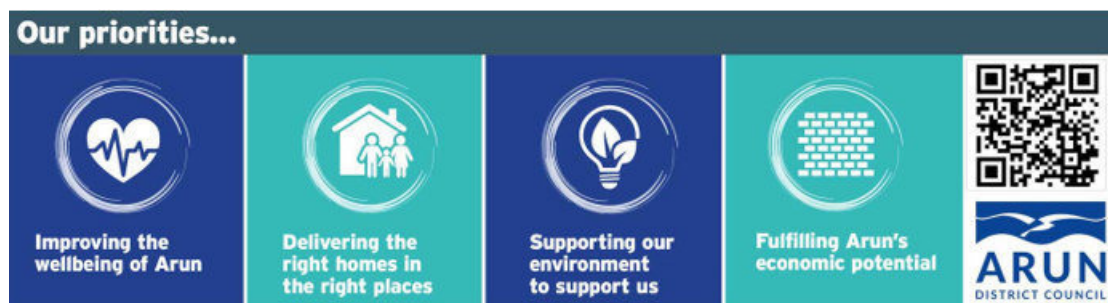
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From: Kai Penny <[REDACTED]>

Sent: 17 October 2025 12:02

To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Subject: Re: P/43/25/PL - Inglenook Sequential Test

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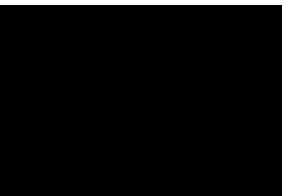
Thanks Hannah.

For clarity, would Pagham Ward, Aldwick West Ward, Aldwick East Ward and Bersted Ward be the appropriate site search area?

Kind regards,

Kai Penny MRTPI

Senior Planner



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From: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Sent: Thursday, October 16, 2025 1:16 PM

To: Kai Penny <>

Subject: RE: P/43/25/PL - Inglenook Sequential Test

Hi Kai,

I've found the following applications with sequential tests which have been undertaken and accepted fairly recently. They're for varying sized sites, but hopefully should be of help in putting together the test. The seq test documents can be found online through the planning search for each reference [Planning application search | Arun District Council](#):

FP/85/25/PL

BR/97/25/PL

BE/48/25/PL

Kind regards

Hannah

Hannah Kersley (she/her)

Principal Planning Officer, Strategic Development

T: 01903 737856

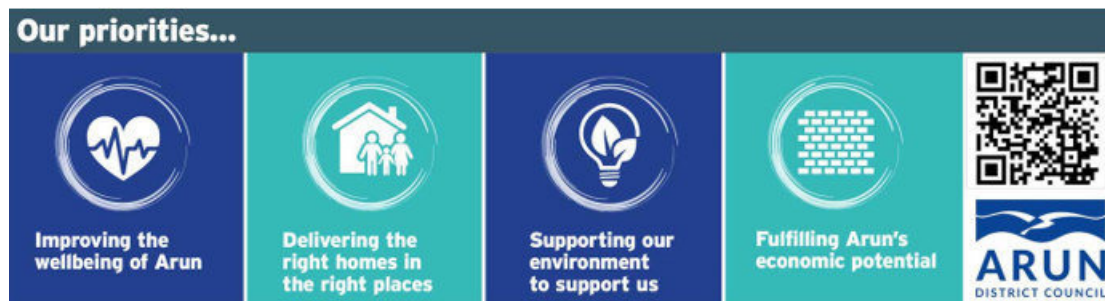
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From: Kai Penny [REDACTED] >
Sent: 13 October 2025 14:28
To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: Re: P/43/25/PL - Inglenook Sequential Test

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Hi Hannah,

Thank you for the below.

You mentioned that you were aware of sequential tests being undertaken on other sites, could you forward those examples when you get a chance?

Kind regards,

Kai Penny MRTPI
Senior Planner



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RTPI Planning Consultants

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From: Hannah Kersley <Hannah.Kersley@arun.gov.uk>

Sent: Monday, October 13, 2025 2:16 PM

To: Kai Penny <>

Subject: P/43/25/PL - Inglenook Sequential Test

Hi Kai,

Thank you for taking my call just now in respect of the Sequential Test.

For the test, we would look for the following parameters to be met:

- Search Area to be Pagham, Aldwick and Bersted
- Within the Built Up Area Boundary first and foremost (however we would also be obliged to consider any sites outside of the BUAB which would be suitable, i.e. brownfield)
- Capable of delivering 6 dwellings (but can be made of a series of two or more smaller sites)
- Do not need to be applicant owned
- Have reasonable prospect of being developed at the same time as the proposal
- Is able to meet the same development needs
- Is at lower risk of flooding
- Similar development density to the proposed

Please do let me know if there are any further queries with this.

Kind regards,
Hannah

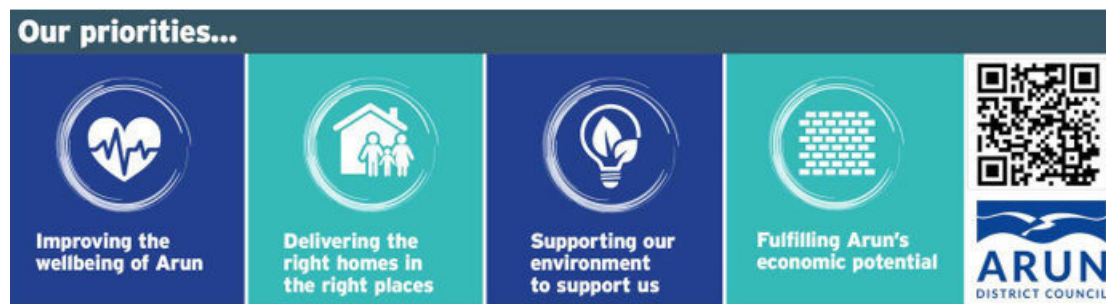
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