

Miszewska, Arleta

From: Boulter, Jacqueline
Sent: 06 March 2023 13:22
To: Miszewska, Arleta
Subject: RE: Planning Application APP/21/01351 Land south of Saltmarsh Lane - Further Policy Comments on Flood Risk Note Addendum

Dear Arleta,

I have reviewed the applicant's Flood Risk Technical Note Addendum dated March 2023. This has been produced to address the comments on the FRA raised by coastal partners. They will no doubt comment further on this addendum and its conclusion that it is possible to deliver safe development.

The addendum does not include a sequential test and I am not aware that this has been submitted under separate cover. The applicant has previously indicated that they do not consider a sequential test to be required. I continue to disagree with this opinion, and refer again to National Flood Risk Guidance <https://www.gov.uk/guidance/flood-risk-and-coastal-change#the-sequential-approach-to-the-location-of-development>. Paragraph 23 in particular – pasted below for ease of reference - makes it clear that flood risk includes future flood risk and that the sequential test is required even if development can be made safe (my underlining).

What is the aim of the sequential approach?

The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test. Other forms of flooding need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so that the sequential approach can be applied across all areas of flood risk.

Paragraph: 023 Reference ID: 7-023-20220825 Revision date: 25 08 2022

Beyond the matter of flood risk, I would also note that my initial response in 2022 highlighted further policy concerns with the principle of development in relation to possible ecological impacts and the lack of a transport assessment to satisfy the requirements of the Council's [Housing Delivery Position Statement](#) Principle 3. Similar to the flood risk matter, it does not appear that these have been addressed by the applicant.

On this basis a policy objection remains.

Jacqueline Boulter

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