



Allison Keech <keechplanning@gmail.com>

Fwd: Upper Beeding (Riverside)

1 message

Allison Keech <keechplanning@gmail.com>
To: Allison Keech <keechplanning@gmail.com>

24 November 2018 at 16:22

----- Forwarded message -----

From: **Norman.Kwan** <Norman.Kwan@horsham.gov.uk>

Date: Fri, 23 Nov 2018 at 17:26

Subject: Upper Beeding (Riverside)

To: Allison Keech <keechplanning@gmail.com>

Cc: Sean (teatum@btinternet.com) <teatum@btinternet.com>, Gavin.Curwen <Gavin.Curwen@horsham.gov.uk>

Hi Allison,

Sorry I haven't had a chance to come back to you. I have been in communication with EA on the matter of Riverside and it has been difficult trying to get a hold of the officer I am dealing with. Having passed on the FRA you sent me they have come back to me to state the version (Sept 2018) was adequate and the scheme proposed in the FRA providing certain conditions were met was acceptable. On face value the FRA submitted to the EA accounted for two dwellings but should the steering group still support this allocation it must be pretty stringent in policy terms to satisfy the EA with a full FRA with the latest flood risk/climate change data factored in for the full allocation of 9 sheltered housing units. If that remains the case the following steps must be taken and considered:

1. Regarding the sequential test we spoke at length on the phone on this matter and I have attached a guidance note for reference. I think a short statement undertaken by the Parish following the step by step guidance note will be sufficient to demonstrate the sequential test has been passed and HDC state it is appropriate. The key question the sequential test proposes is as follows:

Are there any reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed?

The narrative is that the parish has considered all available sites outside flood zones first and with the exception of Church Farm have allocated them. Riverside is considered to be appropriate as it is providing much needed sheltered housing tipping it is favour in terms of the planning balance. In the statement please refer back to the AECOM site assessment report, call for sites consultation and other pieces of relevant evidence that all sites have been presented been considered. Furthermore, it should be made explicit that Upper Beeding is very constrained and there is limited scope for development as available land is in short supply. Please use the PDF attachment as illustrate this point. Again nine sites have been presented but with the exception of Church Farm adjacent to Caravan Park (Site 7 AECOM Site Assessment report Feb 2018) all sites have been considered for allocation (discounted on grounds of deliverability – access, listed buildings, TPOs and SNCI)

2. As part the statement you should make reference to the Exception Test. Effectively the Exception Test must demonstrate the sustainability benefits outweigh the risks of locating development within a flood zone. I would refer back to your SEA work which I am assuming the planning balance is tipped in favour of designating of Riverside because the sustainability benefits (shelter housing provision, close to services for the people living there etc..). Safe access should also be address as it is part of the exception test.

3. Once the statement has been completed, the steering group should revise the policy to reflect the EA comments which includes the provision of safe access which should be made explicit in policy. Other criterion which also should be included in the policy and reference is made to the requirement made by the EA (development to have finished floor levels of no less than 5.3m ([Above Ordnance Datum - AOD](#) – above sea level), the applicant must also demonstrate safe access provision (as mentioned previously), a full site specific flood risk assessment is required which demonstrates that the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall. Consideration should also be made to employing flood prevention construction methods as part of the policy requirement.

However, serious thought should be given to the EA stipulation of finished floor levels of no less than 5.3m AOD. The resulting design of the scheme may be contrary to the provision of sheltered housing at that location which requires ease of access to and from the property. Levels may be raised so much that it is highly visible and intrusive to other residents. Significant earth movements may also impact on viability as I imagine it will be expensive. You are effectively putting sheltered housing on a hill which may impact on layout, design and access. This may not be acceptable to you and not to the LPA in planning terms! You may not want a huge building in that location if the advice by the EA is driving such a scheme. Something for discussion internally for you guys. If necessary I would approach the landowner's consultants and ask them directly what no less than 5.3m AOD means in reality which will provide you the context you need. Please also consider the design aspect – bungalows may be appropriate to lessen the height of the development but given the potential residents who will live there, mobility will be an issue as you may be asking them to scale a significant gradient to reach their homes!

Should you be satisfied following your conversation with the landowner and/or their consultant and you want to continue with this allocation please send me a revised draft of the policy for Riverside (to include the stringent criterion –and I will seek informal comments from EA).

Finally I have mentioned this previously but if Riverside does indeed fall away you must given some thought to making up the shortfall at Small Dole. Henfield may not now look to allocate development at Small Dole.

Happy to discuss any issue raised in this email.

Many thanks,

Norman Kwan

Senior Neighbourhood Planning Officer

Telephone: 01403 215053

Email: Norman.Kwan@horsham.gov.uk

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Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Glen Chipp

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From: "Hyland, Hannah" <hannah.hyland@environment-agency.gov.uk>

To: "Norman.Kwan" <Norman.Kwan@horsham.gov.uk>

Cc:
Bcc:
Date: Mon, 19 Nov 2018 13:59:52 +0000
Subject: RE: Flood Risk Assessment Report - Riverside Upper Beeding

Hi Norman

Sorry for the delay in getting back to you. We have had a bit of a hunt through our consultation history on the site with regard to the numerous planning applications (see attached). As you will see we have objected to most of these in the past due to inadequate FRAs but we replied in September 2018 and were satisfied that on the basis of a finished flood level of no less than 5.3m AOD that the scheme could go ahead. This was based on an FRA dated September 2018 and was for the demolition of the storage units and construction of 2 dwellings. The FRA was undertaken by the same consultants from the one you shared but had been updated with accurate flood levels etc. and specific to that development rather than the allocation.

As discussed if you are satisfied the Sequential Test has been passed then any site allocation will need to ensure robust policies to ensure an accurate FRA is produced for the whole allocation with appropriate flood levels and necessary mitigation. Obviously there may be knock on consequences for design etc.

I hope this is useful.

Kind regards,

Hannah

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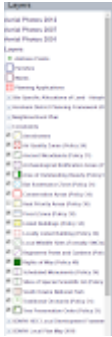
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3 attachments



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37K

 **Sequential Test Process.pdf**
227K

 **Upper Beeding Village (Constraints).pdf**
1487K