



Ben Daines <ben.daines@adur-worthing.gov.uk>

FW: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

1 message

Griggs, David <David.Griggs@environment-agency.gov.uk>
To: Ben Daines <ben.daines@adur-worthing.gov.uk>

10 March 2017 at 15:24

Hi Ben,

Please see the below email I've just sent to Boyer.

Subject to the proposed FFL being achievable, we have no in principle objections to the development on flood risk grounds. Therefore, as long as there are no reasons to believe that such a level couldn't be achieved (e.g. if there are particular restrictions on ridge height in this location), then I don't consider that the EA would find an allocation of the site unsound.

This would depend on the usual evidence for the Sequential Test being demonstrated.

As we advised Boyer in our comments on their Flood Risk Assessment, the matter of safe access/ egress and flood warning and evacuation measures is one for the Local Authority. Acceptance that there is no issues there should be confirmed with emergency planners at Adur or the Fire & Rescue Service.

Kind regards,

David

From: Griggs, David
Sent: 10 March 2017 15:18
To: 'Dinny Shaw' <DinnyShaw@boyerplanning.co.uk>
Cc: 'ajp@tullydeath.com' <ajp@tullydeath.com>; 'Julian Turner (jct@tullydeath.com)' <jct@tullydeath.com>
Subject: RE: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi Dinny,

Providing that finished floor levels to all habitable accommodation can be provided above 5.42mAOD to mitigate the tidal flood risks at the site, we would likely have no objections to the New Salts Farm development on flood risk grounds.

Although there are potentially other environmental issues that we have not considered in depth at this stage (e.g. biodiversity, groundwater protection), we have not identified any critical uncertainties with regards to these that would preclude residential development at the site.

Kind regards,

David Griggs**Planning Advisor | Sustainable Places**

Environment Agency | Solent & South Downs

Telephone: [02030 259625](tel:02030259625)**Environment Agency**

Romsey Office

Canal Walk

Romsey

SO51 7LP

Our **climate change allowances** for planning were updated on 19 February 2016. The guidance is accessible here: [Flood risk assessment: Climate change allowances](#)

Speak to us early about environmental issues and opportunities - we can provide a free basic response. For more detailed advice / meetings / reviews we can provide a project manager to coordinate specialist advice / meetings which costs £84 per hour. For a free preliminary opinion complete the [form](#) and email it back to (planningssd@environment-agency.gov.uk) with as much information about the proposed development as possible.

From: Griggs, David
Sent: 08 March 2017 12:47
To: 'Dinny Shaw' <DinnyShaw@boyerplanning.co.uk>
Cc: 'ajp@tullydeath.com' <ajp@tullydeath.com>; Julian Turner (jct@tullydeath.com) <jct@tullydeath.com>
Subject: RE: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi Dinny,

I'm chasing our flood risk team on this and will let you know by the end of the week.

Cheers

David

From: Dinny Shaw [<mailto:DinnyShaw@boyerplanning.co.uk>]
Sent: 07 March 2017 07:44
To: Griggs, David <David.Griggs@environment-agency.gov.uk>
Cc: 'ajp@tullydeath.com' <ajp@tullydeath.com>; Julian Turner (jct@tullydeath.com) <jct@tullydeath.com>
Subject: RE: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi David

I hope you are well.

I was wondering if you have any update on the EA response for New Salts Farm which you thought you might be able to provide by the 24th Feb.

We will be preparing a note to update the Planning Inspector on the approach to flood risk at New Salts farm to be submitted at the end of this week and would like to include the latest EA input.

thank you

Dinny

Dinny Shaw MRTPI
Principal Planner

t: 0203 872 9873 **m:** 07580 835 062

From: Dinny Shaw
Sent: 21 February 2017 10:38
To: 'Griggs, David'
Cc: 'ajp@tullydeath.com'; Julian Turner (jct@tullydeath.com)
Subject: RE: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi David

thank you for your email and we look forward to receiving acceptance from the flood risk team and agreement that there is a flood risk solution to fluvial / tidal risks at the site later this week.

To keep you updated we are meeting with WSCC to discuss further the surface and groundwater risks and how these can be managed.

I have passed your email on to the client in respect of the suggestions for consideration at detailed design stage.

Kind regards

Dinny

Dinny Shaw MRTPI
Principal Planner

t: 0203 872 9873 m: 07580 835 062

From: Griggs, David [<mailto:David.Griggs@environment-agency.gov.uk>]
Sent: 20 February 2017 12:46
To: Dinny Shaw
Cc: 'ajp@tullydeath.com'; Julian Turner (jct@tullydeath.com)
Subject: RE: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi Dinny,

Thank you for the email.

I've passed on the query to our flood risk team to confirm acceptance of FFL for first floor, which I expect we can provide this week, and that we can agree there is a flood risk solution to the fluvial and tidal risks.

As you know, WSCC will be the competent authority for confirming whether the surface and groundwater risks can be managed.

There are other matters it could be useful to consider and discuss as the detailed design of the scheme progresses to an application.

As with the New Monks Farm site, we would want to see demonstration that any works to the watercourses at the site would be mitigated for to result in a net gain in ecological value at the site. Has any work been undertaken in this regard, e.g. looking at potential for wetland creation as part of the SuDS scheme for the site?

I do not know how far ahead detailed design proposals are with the scheme, but it could be productive to consider at this stage whether principles of water sensitive urban design can contribute in reducing the water management issues the site inherently has (e.g. a water recycling plant (perhaps a joint venture with NMF if economy of scale is an issue; green roofs; aforementioned wetland habitat). Just some things to think about really; would be good to know if any of these strike a chord with yourselves or your client.

Kind regards,

David

From: Dinny Shaw [<mailto:DinnyShaw@boyerplanning.co.uk>]
Sent: 15 February 2017 09:26
To: Griggs, David <David.Griggs@environment-agency.gov.uk>
Cc: 'ajp@tullydeath.com' <ajp@tullydeath.com>; Julian Turner (jct@tullydeath.com) <jct@tullydeath.com>
Subject: FW: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Hi David

I have just left you a voicemail message as I would like to discuss New Salts Farm.

Thank you for your comments on the NSF FRA v4 received at the end of January. As you will be aware we provided a response to these, and WSCC comments, on the 31st January (copied below).

Following the Hearing Session last week on flood risk we are now engaging further with WSCC to seek to resolve their concerns. We would also like to agree with the EA that there is a flood risk solution to the comments raised in your letter.

Namely, as noted in the email from Tully De'Ath below, we will raise the first floor level by 71mm to accord with the level requested and will incorporate recommendations for flood risk protection and Flood Emergency Plan into the scheme.

Given the above please can you provide confirmation that this would address the comments in your letter dated 30th January 2017.

Kind regards

Dinny

Dinny Shaw MRTPI
Principal Planner

t: 0203 872 9873 **m:** 07580 835 062

From: Dinny Shaw [mailto:DinnyShaw@boyerplanning.co.uk]

Sent: 31 January 2017 19:47

To: ben.daines@adur-worthing.gov.uk; bankssolutionsuk@gmail.com

Cc: sarah.poulter@hyde-housing.co.uk; tom.shaw@hyde-housing.co.uk; AndrewWilliams@boyerplanning.co.uk; ajp@tullydeath.com; jct@tullydeath.com; ken.argent@adur-worthing.gov.uk; kevin.macknay@westsussex.gov.uk; caroline.west@westsussex.gov.uk; adrian.jackson@environment-agency.gov.uk; David.Griggs@environment-agency.gov.uk; ray.drabble@westsussex.gov.uk

Subject: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA

Ben

Please find attached and below a response to the EA comments and WSCC comments on the most recent Flood Risk Assessment for New Salts Farm.

I have copied the programme officer so that this information may also be shared with the Inspector and inform the Hearing Session on Issue 8.

As previously set out we are of the view that for the purposes of demonstrating that the site is capable of being allocated in the ALP without flood risk constraint we have provided enough detail to demonstrate that there are viable technical solutions to overcome flood risk at the site. Further the information we have provided demonstrates that the development would be safe for its lifetime, without increasing flood risk elsewhere and has sought to reduce flood risk overall.

We trust that you agree and would welcome the opportunity to discuss and agree common ground in this regard with Adur, WSCC and the EA.

Kind regards

Dinny

Dinny Shaw MRTPI
Principal Planner

t: 0203 872 9873 **m:** 07580 835 062

From: Andrew Picton [<mailto:ajp@tullydeath.com>]
Sent: 31 January 2017 17:23
To: Dinny Shaw
Cc: Tom Shaw; Sarah Poulter; Andrew Williams; Julian Turner
Subject: NSF - Tully De'Ath response to Comments from WSCC and the EA

Dinny

With reference to the letter from WSCC dated 5th January (actually received 27th January) concerning the New Salts Farm flood risk assessment, we have added our responses (in green) on a point by point basis to their original letter.

To summarise the key issues:

Clarification was required on how the new modelling of the Lancing Brookes system was undertaken. We can confirm that JBA (who produced the SFRA for ADUR) undertook the modelling on our behalf, in accordance with the standard requirements set down by the EA. The original SWMP model was very basic and would not be suitable to provide the level of detail required for our analysis. However the raw data was taken from the original model and has been improved upon. It is anticipated that the model will be issued to the EA and WSCC for vetting and ultimately for their (and WSCC) use.

The analysis of the ditch system makes allowances for the new climate change values and a tide lock event. In response to WSCC concerns we have subsequently undertaken additional modelling to assess the impacts of high ground water levels across the catchment and the results indicate that surface flooding on the site is not significant and can be appropriately managed as part of the detailed design process.

The site currently discharges surface water via a combination of infiltration and run-off into the ditches. We are proposing to replicate this within the new drainage design. As part of the detailed design stage infiltration testing will be undertaken to confirm which areas are suitable for infiltration. Where infiltration is not possible the surface water

run-off will be directed to the existing ditch network, which will be controlled to ensure the run-off rate will not exceed greenfield rates, in accordance with standard practice.

WSCC had concerns that there is Insufficient ground water monitoring on the site and that infiltration would not be appropriate. In response, we do have limited ground water monitoring to the west of the site (which is ongoing) but we also have 12 months of monitoring on the eastern side of the site, which has demonstrated that shallow infiltration would be feasible. We have also discussed infiltration with the soils specialist currently working in the site who confirm that shallow infiltration is feasible. The ground water monitoring will continue and will be used to inform the design as to which areas would generally drain to the ditch system or which would infiltrate into the ground.

It is recognised that there will be times where the ground water is very high and reduces the effectiveness of infiltration, however surface water drainage will be linked to the Lancing Brooks system. The SWMP advises that the ground water levels do not significantly affect the water levels within the ditches, consequently there are two disposal methods available for this site.

It is also recognised that there will be rare occasions when the ditches are tide locked and the ground water levels are high. There will be significant areas made available across the site to accommodate surface flooding, and the proposed units types have been designed to provide accommodation at first floor and above, with the ground floor areas are used for parking and utility space.

A full quotative drainage assessment has been requested however at this time would be difficult to provide this level of information when the site is only being considered for inclusion within the Development Plan.

The FRA was produced to demonstrate that there are viable technical solutions to protect the site from flooding without adversely affecting the surrounding areas. It is understood that a greater level of analysis will be required when the site is considered as part of any planning application.

In response to the Environments Agency's letter dated 30th January :

We can raise the first floor level by 71mm to accord with the level requested by the EA.

The EA recommendations for flood protection will be incorporated into the scheme.

The EA recommendations for Flood Emergency Plan will be incorporated into the scheme.

Regarding the Surface Water Flood Risk the response to WSCC attached will cover this.

Regards

Andrew Picton | Associate Director



Phone 01342 828000 | Mobile 07739 265802 | tullydeath.com

Tully De'Ath Consultants, Sheridan House, Hartfield Road, Forest Row, East Sussex, RH18 5EA



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