

From: Mark Cathcart
Sent: 05 July 2017 14:28
To: Page, Sophie [REDACTED]
Cc: kslplanning@environment-agency.gov.uk; David Marlow
Subject: Rother DC planning: Robertsbridge - Hodson's Mill - RR/2017/382/P

Dear Sophie,

Your ref: KT/2017/122684/01/L01

Please find attached the applicant's Flood Risk Sequential Assessment and Exceptions Test report that has been submitted in response to the EA's initial consultation response to application RR/2017/382/P (EA letter dated 19 June 2017). The Council would be grateful to receive your comments on the information within the next 21 days.

Having examined the submitted information we would be interested to receive your view on the following within your overall response:

- para.6.3, says that we should consider the scheme as a whole and not just the part of the development falling within Flood Zones 2 and 3 on the basis that the scheme would be unviable if the wider site was not allowed to be brought forward for redevelopment; no evidence appears to have been submitted by the applicant to demonstrate that this would be the case.
- In the absence of such financial information to support the viability case, under the Sequential Test would it not be reasonable to consider the residual part of the development put forward in the planning application falling outside FZ's 2 & 3 but with the balance required to meet the village's housing need made up of development on alternative sites.
- Para. 6.12: Is it considered reasonable to discount 'sequentially preferable sites' on the criteria that the site is 'greenfield' (this covers all the alternatives looked at – Bishop's Lane, Heathfield Gardens and Grove Farm).
- Para. 6.12 and others: is it reasonable to discount alternative sites for the criteria that they do not accord with the emerging Neighbourhood Plan; i.e. is it not the case that the Neighbourhood Plan cannot be relied upon at this stage because it was not subject to the Sequential Test?
- In Appendix 5 the 'Overall Assessment' of Grove Farm discounts the site partly on the grounds that it is 'not available'. The Council is aware that the owners of Grove Farm have recently held a public exhibition in the village with a view towards submitting a revised application. This suggests that they consider the site to be available.

We are also re-consulting with East Sussex County Council as Lead Local Flood Authority on the information that has been provided.

Kind regards, Mark

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