



Courtley Planning Consultants Ltd  
Tan Oast, Dairy Lane  
Chainhurst, Tonbridge, Kent TN12 9SS  
01622 820561  
howard@courtleyplanning.co.uk

SALEHURST & ROBERTSBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN  
December 2016

Examination by Mr Slater held at a Public Hearing on 28<sup>th</sup> September 2017

**Question 2:**

**Does the allocation of the Mill Site for 100 dwellings unnecessarily put people and properties at risk of flooding? What are the implications of the site access being through land in Flood Zone 3? Is the Mill site in Flood Zone 3a or 3b? Is there information available about “the frequency, impact, speed of onset, depth and velocity of flooding with relation to this site” and what allowance should be given to existence of flood defence scheme that has been completed? Can a safe access and escape route to the site be maintained in times of flood?**

Response prepared by Courtley Planning Consultants Ltd on behalf of Devine Homes. September 2017

## Question 2:

2.1 NPPF Planning Practice Guidance (PPG) states that access requirements should include voluntary and free movement of people during a design flood event. Given the potential depth of flooding here it is clear that a flood event could pose a significant risk to the safety of people and property. There has been no attempt to assess the hazard posed by the depth of flooding in the FRA other than to confirm that it will not be possible to provide a safe escape route.

2.2 The implications for development proposed within Flood Zone 3 for both the “More Vulnerable” i.e. residential use and “Less Vulnerable” i.e. Commercial use are serious considerations. Both uses are clearly “vulnerable” to flood risk and should therefore be removed from Zone 3. This is wholly consistent with the recommendations made by the Local Plan Inspector into the Maidstone BC Local Plan (27<sup>th</sup> July 2017) for the **deletion** of a previously developed site known as Syngenta in Yalding, Kent proposed for 200 dwellings and 8600sq m of employment floorspace. **“The site is in Zone 3a flood risk area and, in addition to the associated risk to the future occupiers, it has not been demonstrated that development would avoid increasing the risk of site flooding. The allocation would remain a large derelict brownfield site and an eyesore in the countryside. Alternative uses should be sought that would be more compatible with its location in a flood risk area”**

2.3 The sole form of vehicle access to the Mill site is from Northbridge Street which falls within Flood Zone 3 and would require crossing over a culverted EA main river once existing the site. If an emergency event occurred there would be no means of vehicles accessing the site from Northbridge Street. No alternative emergency access is proposed as part of the Mill site allocation. With depths reaching 1.13m for the 1 in 100 flood event the FRA confirm there is no safe escape route provided.

2.4 During a flood event the immediate means of pedestrian and vehicular access from the Mill site to Robertsbridge village centre would be cut off. This would include access to Salehurst C of E Primary School; Robertsbridge Community College and the Oldwood Doctors Surgery.

2.5 The Mill Site applicant who has applied for planning permission for 98 dwellings and 1200sq m of employment space has agreed an extension of time with the EA regarding the impacts of climate change and the new flood risk guidance. The previous approach to flood risk was based upon a standard 20% to factor climate change. The new approach in the South East for residential development requires a flow of 45% or 105% based on the new allowances that the EA want to be adhered.

2.6 Both of these new allowances would impact on the current flood extents of the existing FRA for the Mill site.