

## APPENDIX B: SSDC Engineer's Comments

**Nick Head**

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**From:** Roger Meecham  
**Sent:** 21 May 2013 14:46  
**To:** Nick Head; 'Holm, Michael'  
**Cc:** Adrian Noon  
**Subject:** RE: Planning Application 12/04730/FUL - Flooding Issues

Nick

The detailed report produced by Dr Colin Clark certainly brings into serious doubt the fact that the development site is actually within Flood Zone 3 or even Flood Zone 2 as indicated on the SFRA map. I am aware of Dr Clark's reputation and his interest, over many years, in flood risk particularly in the Bruton area and it would be extremely difficult to challenge his findings. I'm not sure how the EA derived the flood risk information, on which our SFRA is based, but I would suspect that the assessment was not as detailed as Dr Clark's.

There is an acknowledged local flooding problem in the main road which is apparently due to inadequate drainage systems. I wouldn't dispute this conclusion but a) this doesn't affect the development site and b) this type of flooding isn't what defines the flood risk zone.

The Council's SFRA is very much a 'live' document and there is in place a process for challenging it (speak to Keith Lane about this) if evidence can be provided.

Roger Meecham

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**From:** Nick Head  
**Sent:** 17 May 2013 12:58  
**To:** 'Holm, Michael'; Roger Meecham  
**Cc:** Adrian Noon  
**Subject:** FW: Planning Application 12/04730/FUL - Flooding Issues

Mike/Roger,

The application was recommended for refusal – partially – because the issue of the sequential test (and exception test thereafter) had not been addressed. The reason in the report was:

*The proposed dwelling would be located within Flood Zone 3 where residential development that would result in people and property being at risk from flooding is only acceptable in exceptional circumstances. No such circumstances have been demonstrated and furthermore it has not been demonstrated that, sequentially, there are no other suitable sites available that would not be at risk of flooding. Accordingly the proposal is considered to fail the required Sequential Test and in these respects, the proposal is contrary to the aims and objectives of the NPPF (in particular paragraphs 14, 55, 100 and 101), and saved Policy ST5 of the South Somerset Local Plan, 2006.*

The committee considering the matter queried the conflicting advice between yourselves. Mike, you were stressing that the LPA needs to ensure that the sequential test has been satisfied; Roger, you were saying we should be relaxed about this. As I read the advice it is clear – as set out in the reason for refusal above. It is not about safety of future occupants (which we agree can be secured). It is about the principle of placing development within Flood Zone 3 and the requirement to demonstrate that there are no other sites. I am not sure whether the submitted info is suggesting that the site is, in fact, within Flood Zone 1 – which would then obviate the need to apply the sequential test.

I would appreciate your further comments, taking into consideration this additional information which the applicants have submitted.

Nicholas Head

Planner

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**From:** Mike Harley [mailto:mike@harley1.net]

**Sent:** 13 May 2013 15:32

**To:** Nick Head; Adrian Noon

**Cc:** Colin Clark; Dawn Harley; Ben Carlisle; Henry Hobhouse; Martin Roberts; Nick Weeks

**Subject:** Planning Application 12/04730/FUL - Flooding Issues

Dear Sir

Attached you will find a copy of my letter to you together with a flood risk report prepared by Dr Colin Clark of the Chardon Hill Research Station, Bruton, that were handed to your reception at the SSDC Offices, Brympton Way at 14:30hrs today 13 May 2013.

Yours faithfully

Michael Harley