

## APPENDIX C: Environment Agency Comments

Mr Nicholas Head  
South Somerset District Council  
Customer Services (Planning) East  
The Council Offices Brympton Way  
Yeovil  
Somerset  
BA20 2HT

**Our ref:** WX/2012/122831/04-L01  
**Your ref:** 12/04730  
**Date:** 07 June 2013

Dear Mr Head

### **FURTHER INFORMATION (FLOODING ISSUES) - ERECTION OF A NEW HOUSE AND GARAGE AT LAND ADJACENT HEATHER HOUSE, ALFORD, LOVINGTON, CASTLE CARY**

Thank you for consulting the Environment Agency on the above application, including the more recent emails including those from Roger Meecham and the applicant, Mike Harley.

As your Council is aware, we are not formally objecting to the current planning application on any technical flood risk grounds, subject to the various mitigation measures proposed in the Flood Risk Assessment being implemented, if permission is to be granted. We have however pointed out the Sequential Test within the National Planning Policy Framework (NPPF) needs to be considered by the your Authority, before making any decision. Section 103 of the NPPF refers to the Sequential Test.

Further to Dr Clark's observations, we believe that there are some valid points that may call into question the accuracy of our Flood Map in the Alford area. In particular, reference to the Bruton reservoir failure inundation map shows that there is clearly a discrepancy between flooded outlines, although our Flood Map simply portrays zones of flood risk, not the actual risk at any given property.

We agree that any call to change the site from Flood Zone 3 to Flood Zone 1 would effectively be a Flood Map challenge to us, rather than a Strategic Flood Risk Assessment (SFRA) challenge to your Council. However, the submitted information alone would not be sufficient to allow use to make a formal revision to our published Flood Map without further work, which would be timely and costly to the applicant. If the applicant wishes to follow our National procedures for a formal Flood Map challenge then we are happy to discuss this further with them.

In terms of your Council's SFRA without any agreed flood map challenge, the submitted

Environment Agency  
Rivers House, Sunrise Business Park, Higher Shaftesbury Road, Blandford, Dorset, DT11 8ST.  
Customer services line: 03708 506 506  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Cont/d..

information would suggest that the site is at worst FZ3a rather than functional FZ3b.

As the Sequential Test is primarily a matter for your Authority to consider, we believe that it would be prudent for the Council to review what planning weight should be attached to this matter, if it is to be used as any grounds for refusal of the application. As the application is only for one new dwelling, we would not expect to be involved further in Sequential Test matters unless the applicant wishes to follow our National procedures for a formal Flood Map challenge.

If you or the applicant wish to discuss the above comments in further detail then they should contact Colin Taylor, Flood and Coastal Risk Management Officer, on 01278 484621.

Yours sincerely

**MR MICHAEL HOLM**

**Planning Advisor - Sustainable Places**

Direct dial 01258 483380

Direct e-mail michael.holm@environment-agency.gov.uk