

## Rebecca Buckley

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**From:** Denise Duggan  
**Sent:** 04 November 2024 10:15  
**To:** Denise Duggan  
**Subject:** FW: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

Mrs Denise Duggan  
Senior Planning Officer (Policy)

Malvern Hills & Wychavon Planning Policy Team  
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Queen Elizabeth Drive  
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**From:** Bennion, Matthew <[REDACTED]>  
**Sent:** 04 July 2024 08:57  
**To:** Denise Duggan <[REDACTED]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

You don't often get email from [matthew.bennion@environment-agency.gov.uk](mailto:matthew.bennion@environment-agency.gov.uk). [Learn why this is important](#)

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Hi Denise,

Apologies, I've just been trying to find the email that I sent back in February but I'm having trouble locating it.

Yes, we noted the changes to pages 53 and 76 which references the Severn Vale Management Catchment, so we were happy to go with the update. I hope that helps.

Kind regards

Matt

**Matthew Bennion**  
Planning Specialist  
Sustainable Places  
West Midlands Area

**Team Email:** [westmidsplanning@environment-agency.gov.uk](mailto:westmidsplanning@environment-agency.gov.uk)  
**Working Days:** Monday to Friday



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**From:** Denise Duggan <[REDACTED]>  
**Sent:** Wednesday, July 3, 2024 10:29 AM  
**To:** Bennion, Matthew <[REDACTED]>  
**Subject:** FW: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

Hi Matthew

Fran might have already asked you about this but she has now moved teams and so I am making sure that you are now happy with the attached report – please can you confirm? Thanks, Denise

Mrs Denise Duggan  
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**From:** Bennion, Matthew <[REDACTED]>  
**Sent:** Tuesday, February 20, 2024 12:48 PM  
**To:** Frances Fleming <[REDACTED]>  
**Cc:** Denise Duggan <[REDACTED]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Frances,

Thanks for sending this over, apologies for taking a couple of days to reply. I now note reference to the Severn Vale Management Catchment on page 53 and page 76.

Whilst this is acceptable, would it please be possible to amend the reference to the EA guidance on page 76 to 'as per the EA West Midlands Area Climate Change Guidance'. If referenced as 'EA guidance', it's not specific to our area guidance which is more definite than the generalised national guidance (and what we would expect planning apps in the West Midlands Area to work off of).

Happy to confirm once the change has been made.

Kind regards

Matt

**Matthew Bennion**  
Planning Specialist  
Sustainable Places  
West Midlands Area

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**Team Email:** [westmidsplanning@environment-agency.gov.uk](mailto:westmidsplanning@environment-agency.gov.uk)  
**Working Days:** Monday to Friday



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**From:** Frances Fleming <[REDACTED]>  
**Sent:** Friday, February 16, 2024 11:59 AM  
**To:** Bennion, Matthew <[REDACTED]>  
**Cc:** Denise Duggan <[REDACTED]>

**Subject:** FW: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Matthew

Please see attached updated SFRA from JBA, please let me know whether this is now acceptable.

Kind regards,

Frances Fleming BA (Hons), Msc

Planning Policy Officer  
Planning and Infrastructure  
Wychavon and Malvern Hills District Council  
Civic Centre, Queen Elizabeth Drive, Pershore,  
Worcs WR10 1PT

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**From:** Bennion, Matthew <[REDACTED]>  
**Sent:** Friday, February 9, 2024 12:08 PM  
**To:** Denise Duggan <[REDACTED]>; Frances Fleming <[REDACTED]>  
**Cc:** Louise Goode (Guest) <[REDACTED]>; Carlyon, Hermes <[REDACTED]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Denise,

Thank you for your email.

I have discussed your email with my flood risk colleagues and we would be happy for the site-specific FRA to pick up the appropriate climate change allowances with consideration of the Severn Vale allowance.

We are not confident that the Severn Vale catchment climate change value (37%) would show no difference to the flood extent of the Avon Warwickshire catchment climate change value (21%) as we are aware locally that these two catchments are functionally linked in this location. This is mentioned in our area climate change guidance '*Use of the 'River Avon' nominal is only valid upstream of the M5 crossing (National Grid Reference: SO9146836959) and downstream of this point, the 'Lower Severn' nominals should be used.*', I have attached this guide for completeness.

Instead of re-running the model, we would be satisfied with the SFRA if a line/paragraph was to be included noting that there is an effect in this area from the Severn Vale management catchment and that the site-specific FRA would be expected to pick this up. We would be happy to review the wording once produced at no further charge.

For your information and as you are likely aware, the planning application for the Mitton Site is under consideration now. I have contacted the planning officer (Jay Singh) to make them of the discrepancy and that we would like to update our position in light of our review of the Level 2 SFRA. I am currently awaiting a response.

Kind regards

Matt

**Matthew Bennion**  
Planning Specialist  
Sustainable Places  
West Midlands Area



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**From:** Denise Duggan <[redacted]>  
**Sent:** Monday, February 5, 2024 10:55 AM  
**To:** Bennion, Matthew <[redacted]>; Frances Fleming <[redacted]>  
**Cc:** Louise Goode (Guest) <[redacted]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Matthew

I have heard back from the consultants, JBA, who are of the opinion that they have followed the guidance previously provided and EA advice online and used the Avon catchment climate change allowances as required. Given that the risk to the site is low, they do not believe changing the climate change allowances modelling to the Severn Vale allowances would show any differences on flood extents, and therefore not impact the site. They believe that this modelling should be provided as a site-specific FRA, and not required at the strategic level. I welcome your response to this, thanks, Denise

**Mrs Denise Duggan**  
Senior Planning Officer (Policy)

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**From:** Bennion, Matthew <[redacted]>  
**Sent:** Wednesday, January 31, 2024 12:21 PM  
**To:** Denise Duggan <[redacted]>; Frances Fleming <[redacted]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Denise,

We would be happy to have another look once the work has been completed. I can confirm that this would be at additional cost but would likely be reduced from the initial review if the changes we have recommended are made and the outputs are similar. We would be able to provide you with another quotation once we've seen the revised document.

As we mentioned, on the whole, the document was of good quality, and we are satisfied with the approach that has been taken (excluding the climate change values).

Kind regards

Matt

**Matthew Bennion**  
Planning Specialist  
Sustainable Places  
West Midlands Area



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**Working Days:** Monday to Friday



# Creating a better place for people and wildlife

**From:** Denise Duggan <[REDACTED]>

**Sent:** Wednesday, January 31, 2024 11:54 AM

**To:** Bennion, Matthew <[REDACTED]>; Frances Fleming <[REDACTED]>

**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Thank you Matthew for your considered response on the above which we have forwarded onto our consultants, JBA, for their review. Please can you confirm whether you will want to see the revisions when they are made and whether this is included in the original charge for the service. Thank, Denise

Mrs Denise Duggan  
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**From:** Bennion, Matthew <[REDACTED]>

**Sent:** Wednesday, January 31, 2024 10:25 AM

**To:** Frances Fleming <[REDACTED]>

**Cc:** Denise Duggan <[REDACTED]>

**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Frances,

Thank you for your patience in this matter, we have now finished our review of the SFRA Level 2 document. I have attached the response for your information.

Thanks again for engaging in our cost recovery service. I trust that the response is of use.

Kind regards

Matt

**Matthew Bennion**  
Planning Specialist  
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West Midlands Area

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**From:** Bennion, Matthew <[REDACTED]>  
**Sent:** 12 December 2023 14:07  
**To:** Denise Duggan <[REDACTED]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Denise,

Thank you for your patience in waiting for our response, apologies for taking a while to get back to you.

I have now been able to discuss the SFRA with my flood risk colleagues. We were trying to ascertain whether a full model review would be necessary as part of a review of the SFRA. Upon a brief look, it appears that the modelling undertaken to inform the SFRA shows similar results to our own modelling and the previous model submitted to us which was reviewed (I believe that this review was as part of an outline planning application). As such, it would be unlikely that we would ask for a model review.



We would be happy to provide comments upon the SFRA (excluding a model review as explained above), however, this would be subject to our cost recovery service. The quote for this review would be £1000+VAT based on 10 hours work for us to provide comments upon the SFRA. If you would like to proceed with this, please can you fill out the attached pro-forma and confirm that you accept the quotation.

I would be happy to send you a formal offer letter back to you upon confirmation of the above.

If you have any questions, please feel free to contact me.

Kind regards

Matt

**Matthew Bennion**  
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Sustainable Places  
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**Working Days:** Monday to Friday



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**From:** Denise Duggan <[redacted]>  
**Sent:** Monday, December 11, 2023 4:22 PM  
**To:** Bennion, Matthew <[redacted]>  
**Subject:** RE: Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

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Hi Matt – please can you advise when you might be in a position to feedback your comments on the Level 2 SFRA, just so that I know a rough timeline, thanks, Denise

**Mrs Denise Duggan**  
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**From:** Denise Duggan

**Sent:** 16 November 2023 11:25

**To:** 'graeme.irwin@environment-agency.gov.uk' <[REDACTED]>

**Subject:** Level 2 SFRA for Mitton Strategic Allocation - SWDP54 refers - South Worcestershire Development Plan Review

Hi Graeme

Apologies for not forwarding this to you sooner but I was unable to open all of the files from our consultants JBA until today.

You may recall that you made comments regarding Mitton strategic allocation in the Reg19 consultation for the South Worcestershire Development Plan Review – copy of your comments are attached. JBA have now completed the Level 2 SFRA for Mitton and I attach for your comments – I expect I will have to send it via more than one email because of the size of the files so apologies for that.

I look forward to hearing from you, thanks, Denise

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