

Arun District Council
Development Control
1, Arun Civic Centre Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2019/121572/01-L01
Your ref: AB/88/19/PL

Date: 01 October 2019

Dear Sir/Madam

38 NO RESIDENTIAL APARTMENTS (9 NO 1-BED UNITS & 29 NO. 2-BED UNITS) ALONG WITH ACCESS, OFF-STREET PARKING, AMENITY SPACE & ENHANCEMENTS TO THE LOCAL FOOTPATH NETWORK.

LAND AT ELECTRICITY SUB STATION FORD ROAD ARUNDEL BN18 9DX

Thank you for the consultation on the above application , please quote our reference on all correspondence.

Environment Agency position

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

The development shall be carried out in accordance with the submitted flood risk assessment (written by RSK, dated June 2019) and the following mitigation measures it details:

- **Finished floor levels for habitable accommodation shall be set no lower than 5.3 metres above Ordnance Datum (AOD)**
- **Compensatory storage shall be provided in accordance to drawing number 10-12 rev. P4 contained in Appendix N of the FRA.**

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason(s)

To reduce the risk of flooding to the proposed development and future occupants

To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.

Our response to this application is on the understanding that Arun District Council is satisfied that the Sequential test has been adequately demonstrated to the requirements set out in the national Planning Policy framework (NPPF).

Informatives

Any works in, under or over, or within 5 metres of an IDB ditch or Ordinary Watercourse will need a Flood Defence Consent from the Environment Agency or West Sussex County Council respectively.

Advice to Local Planning Authority

Voids should be designed to allow the free flow of water up to and including the 1 in 100 flood event, with an allowance for climate change. Openings should be designed to be as large as feasible within the proposed development. Individual openings should be a minimum of 1 metre wide by the height of the predicted depth of flooding (including an allowance for climate change), from the existing ground level.

Voids should be kept open and maintained as such in perpetuity. It is imperative that the void space beneath the dwelling is kept free from debris throughout the lifetime of the development. This enables the voids to fulfil their flood storage role. The local planning authority should be satisfied that this is achievable and may wish to consider including a condition on any decision notice where permission is granted or requiring the applicant to enter into a legal agreement.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The planning practice guidance (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.

Advice to applicant

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. In the meantime, if you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. The following documents may also be useful:

Department for Communities and Local Government: Preparing for floods

<http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf>

Department for Communities and Local Government: Improving the flood performance of new buildings: <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

Please do not hesitate to contact me on the below should you have questions.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

