



Elizabeth Lawrence

14th April 2021
Our Ref: D1922
ADC Ref: AL/27/21/PL

Dear Elizabeth,

RE: AL/27/21/PL - FORMER GRAIN STORES, SACK LANE, LIDSEY

Thank you for passing on the comments from ADC with regard to the Flood Risk Assessment submitted for the above planning application. Please find my response below.

'Site is shown on our SFRA to be within FZ3a by 2115 as such we will need to consider future flood risk and as per National Policy, a Sequential Test would be Required [Sic].'

The Flood Risk Assessment has considered the flood risk to the development for its lifetime, taking into account the influence of climate change, as detailed in Section 2.2 and Section 5.4, in accordance with national policy for flood risk assessment and Arun District Council Policy with respect to site-specific flood risk assessments.

As detailed within Table 3 in Section 2.2, the site is protected from flood risk for the lifetime of the development by the presence of sea defences. The site is however at residual risk of undefended tidal levels in year 2115. The site is shown to be within Flood Zone 1 and shown to be defended for the lifetime of the development by the presence of coastal defences.

The coastal defences offer a level of protection equivalent to Flood Zone 1 for the lifetime of the development, however Flood Map for Planning (which sets out the Flood Zones) does not consider the presence of sea defences, and as such the site would be considered to be within 'Flood Zone 3 Defended' in 2115. The site therefore does not require a Sequential Test.

Although the site has been assessed to be at low risk of flooding, flood mitigation has been incorporated to account for the residual risk of tidal flooding with in Section 6 and 7, which details the requirements that the proposed development will need to include within the construction detail, level and drainage design at detailed design in order to ensure safe occupation for the lifetime of the development.

These mitigation measures are in accordance with the Planning Practice Guidance of the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change, to reduce the risk of flooding to the proposed development and future occupants.

These measures are echoed in the response to this planning application by the Environment Agency, dated 24 March 2021, which accordingly holds no objection to this planning application on flood risk and drainage matters but proposes a planning condition that the flood mitigation measures detailed are adhered to, and we would agree with this proposal.

I trust this will enable ADC to review their position with regard to the need for the Sequential Test.

Yours sincerely,

Dan Lytton
Bright Plan Civils