

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

Our ref: HA/2019/120999/02-L01
Your ref: BE/135/18/PL
Date: 27 June 2019

Dear Sir/Madam

ADDITIONAL RESPONSE HYBRID APPLICATION COMPRISING OF OUTLINE APPLICATION FOR THE PRINCIPLE OF EMPLOYMENT USES B1-B8. FULL APPLICATION FOR CLASS B8 WAREHOUSE WITH FUEL ISLAND & CAR PARKING (UNIT 2), 2 NO. CLASS B1/B8 EMPLOYMENT UNITS WITH ASSOCIATED PARKING & SERVICING (UNITS 6 & 7), CLASS A1 RETAIL FOOD STORE WITH CAR PARKING & SERVICING (UNIT 9), 2 NO. DRIVE THRU UNITS WITH CAR PARKING & SERVICING (UNITS 4 & 5), CAR SHOWROOM, WORKSHOPS (INCLUDING MOT TESTING), VEHICLE STORAGE, EXTERNAL DISPLAY AREAS, SERVICE AREAS & PARKING (UNIT 8) TOGETHER WITH ACCESS ROADS, ASSOCIATED GROUND & ENGINEERING WORKS, LANDSCAPING & ANCILLARY WORKS. THIS APPLICATION AFFECTS THE CHARACTER & APPEARANCE OF THE SHRIPNEY CONSERVATION AREA & A PUBLIC RIGHT OF WAY.

SALT BOX FIELD LAND OFF ROWAN WAY BOGNOR REGIS

Following confirmation that the proposal includes raising ground levels we would have the following comments to make that supersede our previous response.

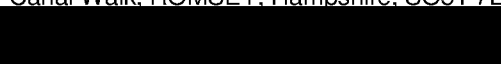
Environment Agency Position

We object to the proposed development due to concerns regarding impact on flood risk.

Drawing SBX-KSA-Z0-XX-DR-C-6900 shows that the applicant proposes to raise ground levels on the site. However the drawing makes no reference to Flood Zone 2.

Loss of flood storage through land raising must be calculated and be compensated for. The drawing shows a compensation pond situated within the floodplain. Any features designed to compensate for loss of flood storage must sit outside of Flood Zones 2 and 3 while maintaining connectivity with the floodplain.

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.



Cont/d..

The submitted drawing 23113_TOPO shows that a detailed topographic survey has been carried out on the site as part of this application. Upon reviewing the levels it appears these level differ from the remotely surveyed ground levels used in the Environment Agency flood model for this area. This would suggest the modelled flood extents used to create Flood Zones 2 and 3 may not show the true flood risk on this site. Given that a detailed topographic survey is likely to be more accurate than LiDAR data, and that there is a visible difference between the levels, we request that contours for the flood levels provided below are plotted on this detailed survey data.

How to overcome this objection

- Provide clear maps showing how Flood Zones 2 and 3 are likely to change as a result of the development.
- Provide a clear map showing contours for the modelled flood levels below using the topographic survey data mentioned above.
- Amend FRA document to show modelled flood levels; 1%AEP – 1.35mAOD, 0.1%AEP – 2.1mAOD, 1%AEP(45%CC) – 1.85mAOD.
- Provide calculations and drawings that show the expected loss of flood volume up to the FZ2 flood level (2.1mAOD) and details of the proposed mitigation outside of FZ2.
- Provide evidence to show that any flood compensation areas will not drop below recorded ground water levels.

Under the terms of the Water Resources Act 1991, and our Byelaws, prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within (8m) metres of the top of the bank of Shripney Manor Ditch, designated a 'main river'.

Advice to Local Planning Authority

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Planning Liaison Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome

Advice to Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

