

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

Our ref: SX/2008/103545/01-L01
Your ref: BE/1/08
Date: 01 February 2008

Dear Keith

OUTLINE APPLICATION FOR MIXED USE EMPLOYMENT (CLASS B1 HIGH QUALITY BUSINESS PARK COMPRISING UP TO 19,500 SQM GROSS FLOORSPACE) AND RETAIL (CLASS A1 GROCERY STORE UP TO 4,459 SQM NET SALES AREA) TOGETHER WITH PARKING, NEW HIGHWAY & ASSOCIATED SERVICING, INFRASTRUCTURE & LANDSCAPING - LAND AT OLDLANDS FARM, SHRIPNEY ROAD, BOGNOR REGIS

Thank you for your consultation on the above proposal which was received on 16th January 2008. Please quote our reference number on any further correspondence.

I can confirm that we object to this application as submitted. This objection is based on two reasons:

1. Insufficient evidence has been provided that the flood risk Sequential Test has been adequately demonstrated.
2. Insufficient detail regarding surface water storage capacity has been provided to demonstrate that the flood risks resulting from this development can be safely managed.

These reasons for objection are expanded upon below:

1. Sequential Test

Insufficient evidence has been provided to enable your Authority to conclude, as required by PPS25, that the flood risk Sequential Test is met.

Before proceeding to a determination, your Authority must apply the Sequential Test; that is, it must consider whether the applicant has demonstrated that no alternative sites are available in a lower flood risk zone than Zone 3a. As PPS25 paragraph 17 applies to this part of your Authority's area you must first consider whether any

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reasonably available site is available in Flood Zone 1, and if not then likewise in Zone 2.

Whilst the site is allocated in the adopted Arun District Local Plan 2003 this is not sufficient evidence to demonstrate how the Sequential Test had been applied. This is in accordance with a recent Appeal Decision in Southampton where the Inspector cited that the fact the site is allocated for housing in the Local Plan is not conclusive evidence of a Sequential Test (Reference: APP/D1750/06/2032999/NWF).

Our objection will remain until evidence has been provided by your Authority that the Sequential Test has been carried out to adequately demonstrate that there are no reasonably alternative sites in areas with a lower probability of flooding that would be appropriate for the type of development proposed.

The Sequential Test itself is set out in paragraphs 16 and 17 of the PPS.

2. Surface water drainage

The application as submitted provides insufficient detail of surface water drainage storage and disposal. In the absence of these details we are unable to be certain that sufficient surface water storage is available in the areas shown on the plans as set aside for this purpose. As a result the application does not demonstrate that the flood risks resulting from this development can be safely managed.

On receipt of further information demonstrating that the surface water drainage from the site would not exacerbate flood risk we would be able to progress the removal of this objection. In particular we would require clarification of the following:

- Whether the surface water discharge point will be within the planning application red line boundary;
- Calculations, long sections or cross sections to confirm the storage volumes proposed. These should be based on a topographic survey;
- The Flood Risk Assessment (FRA) proposes that the minimum level at which surface water would be stored is 0.8m AOD. The FRA notes that the 100 year plus 20% climate change allowance flood level in the Lidsey Rife was estimated by WSP at 1.82m AOD. We are concerned that the water level in the local watercourse could be higher than 0.8m AOD. This would need to be clarified in order to calculate the available storage volume.

Notwithstanding the above objection we have further concerns and requirements relating to protection of controlled waters and ecology of the area. We will offer further information and conditions to reflect these concerns subject to further consultation and the removal of our objection.

If the above objection is not resolved through further discussion and you remain minded to approve this application you are required to notify the Secretary of State as set out in DCLG Circular 04/2006 'The Town and Country Planning (Flooding)(England) Direction 2007'.

I trust that above information is satisfactory. If you require any further information or would like to discuss furthering the removal of the above objections please do not hesitate to contact me in the first instance.

Yours sincerely

Hannah White
Senior Sustainable Development Planner

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