

Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Mr Vick
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date 7th March 2024

Dear Mr Vick,

RE: BE/40/22/PL – Former Bartons Infant School, Romney Broadwalk, Bersted, PO22 9BH

Thank you for your consultation on the above site, received on 13th February 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for the demolition of former school building and erection of 20 new dwellings and associated car parking, cycle parking and landscaping.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) & Drainage Strategy relating to:

- The application is not in accordance with Policy W DM2 Flood risk and Policy W DM3 Sustainable Urban Drainage Systems in Arun Local Plan, paragraph 173 and 175 in NPPF and PPG Flood risk and coastal change.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues highlighted below are adequately addressed:

1. Although the FRA states calculations are in the appendices, they are not there. Calculations using up to date parameters (Cv value 1 and 45% climate change allowance) must be provided for:
 - 50% AEP rainfall event does not surcharge in the drainage network
 - 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water

- 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building or utility plant susceptible to water within the development boundary.
- Half drain down times must be provided and show that they are within 24 hours or 48 hours for lined features.
- Include a surcharged outfall to a watercourse or sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full or bank full if not already hydraulically modelled.

Note for LPA: I have emailed separately about sequential test and PPG update now considering all sources of flood risk.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Arun District Council on behalf of West Sussex County Council. It is advised to discuss proposals for any works at an early stage of proposals.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

Eleanor Read
Flood Risk Management Team



Annex

The following documents have been reviewed, which have been submitted to support the application;

- Drainage Layout by GTA Civils & Transport, 21/06/2023, revision P7.
- Flood Risk Assessment by GTA Civils & Transport, 29/03/2022, corrected first issue

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Littlehampton, West Sussex, BN17 5LF

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Regards

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Any formal reconsultation on the application should be directed to [REDACTED] but the responding officer can be contacted directly via email if there are any questions relating to this response.

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