GROVE DESIGN UK

8 Willowhale Avenue

Aldwick

PO21 4AY

[redacted]

21 September 2020

Attention of Daniel Vick

Arun District Council

Littlehampton

Project reference – 49 Warren Way Barnham PO22 0JX – BN/15/20/PL Refused 24th June 2020

The above proposed end of terrace 2 bedroom dwelling was refused in the light of no Sequential or Exception test having been undertaken.

The following comments set out the basic requirements regarding the Sequential Test and its application to the above site as commented on by yourself following having to have the abrupt time related instigation of the refusal advised. You said to contact you again when basics had been looked into in view of re-applying this application – the following has taken longer than originally envisaged partly due to the locating of the planning application for the related site etc and then sorting out the following details.

(A) From the Floor Risk Assessment supplied with the application, the Sequential Test was not advised but the interpolation of tables included in it indicated that the Exception Test would apply at some point but not referred to in the summary – had therefore assumed could have been a condition relating to approval.

(B) Sequential Test requirement – plot is in Flood plain 3a and to our knowledge no similar test has been carried out in the immediate area, [if one has been done, would appreciate being advised]

(C) Minor development – the logic as relating to a group of a few houses as opposed to just one dwelling [small one at that] could be understandable but when an identical extension doesn't require the test but as a new attached dwelling does, especially as both would require exactly the same pile foundations, EA approval [with agreed conditions including GF FFL above highest 100yr + requirements as per FRA etc],

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flood resilient construction [per DEFRA / EA], and same care to the rife and its banks too.

(D) This specific site and not any other one – client owns the property No 49 Warren Way as his sole dwelling and initially thought just to extend for which he has permission ie BN/48/19/HH, and then decided to apply for the property as a new dwelling that he could live in himself. From that point of view, having the rife on the edge of his property was immaterial to his reason to extend the current terrace property, hence there were no other relative sites in his situation especially as the properties come within the affordable home price structure and the property being strategically placed close to local shops ', good local bus services and very close to Barnham station.

(E) This plot is only applicable for the one extra property, it is not a general development site.

(F) The property lies well within the Local Plan development area along with many other properties within the Barnham village Flood Plain 3a.

(G) Comparable site / new development – would refer to No 4 Lake Lane – BN/23/15/PL which is a few hundred metres upstream from 49 Warren Way. This is a pair of semi-detached houses built within approx. 3M of this Rife.

(H) This site has many similarities in regard to the impact of having the same rife / flood plain. Perhaps one of the more noticeable items is that using the same data etc , 4 Lake Lane is in a worst flood scenario and could flood to a depth of 310mm above ground Floor FFL, whereas 49 (A) Warren Way from FRA would fall approx. 50mm short of reaching the GF FFL. Not only that but as the property was also raised an additional 300mm+ above the original bungalow's FFL, total water depth plus flow current would mean safe refuge would need to be provided within building [plus all warning notices and escape procedures etc]. Similar Flood Resilient Measures are applicable to both properties except that 4 Lake Lane required provision for road flood water to pass under property plus provide temporary storage on site for the same to then be control released into the rife when suitable. Should Warren Way ever flood, the cul de sac end finishes at right angles to the rife – excess water could flow across front corner of No 49 (A) into the rife.

(I) The frontage of both properties would have permeable ground surfaces to mitigate the amount of surface water run-off.

(J) Most of the garden areas will remain as soft landscaping to aid the natural migration of water into the ground.

(K) The FRA confers that the proposed development will not cause any increase of flood risk to surrounding areas.

(L) The EA subject to their basic conditions re FFL, no GF sleeping accommodation etc have approved the development.

(M)There is an inference noted by ADC Engineers [re 4 Lake Lane] that the FRA suggests both the Sequential and Exception Test may not have been carried out [an assumption that they had been carried out] – on checking through all paperwork these tests were not supplied or pursued as missing.

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(N) Since the serious 1993 flooding, the twin Barnham railway culverts were increased in capacity later in the 1990's to alleviate the bottle neck and back-up of flooding.

(O) On site drainage storage of storm water eg soakaways with drainage crates or similar approved to control run off and assist site absorption under normal conditions via SUDS or similar requirements plus ensuring all sealed foul drainage below FFL to prevent flooding of sewers and back flow prevention measures also.

(P) Measures were also required to protect and stabilise the banks of the rife.

(Q) To conclude that conditions re 49(A) Warren Way are actually far less severe than those of 4 Lake Lane plus neither the Sequential or Exception tests were carried out or were requested and permission was granted [obviously subject to sorting of required rife related conditions]

(R) The above contents could outline by comparison of being two nearby sites the basic requirements for an Exception Test

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