

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

Our ref: HA/2018/120569/02-L01
Your ref: BR/139/18/OUT
Date: 18 September 2018

Dear Sir/Madam

Additional information outline application with some matters reserved for the demolition of 1 no. Existing dwelling to form access for 6 no. Residential dwellings

Rear of 94-100 Hook Lane, Bognor Regis, PO22 8AT

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

Following the submission of a suitable flood risk assessment we are happy to **remove our objection subject to the inclusion of the following 3 conditions**, in any permission granted.

We consider that planning permission could be granted to the proposed development, as submitted, if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Condition 1 – Floodplain compensation

No development approved by this planning permission shall take place until such time as a floodplain compensation scheme has been submitted to, and approved in writing by, the local planning authority.

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Condition 2 – Design and maintenance regime for proposed voids

No development approved by this planning permission shall take place until such time as information on detailed design and maintenance regime for the proposed voids beneath the buildings (including size, location and appearance) has been submitted to, and approved in writing by, the local planning authority.

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

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Reason for condition 1 and 2

To reduce the risk of flooding to the proposed development and future users and to prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided in line with section 9 of the Planning Practice Guidance of the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Condition 3 – Implementation of Flood Risk Assessment

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (WSP, July 2018) and letter dated 28/08/2018, and the following mitigation measures detailed within the FRA:

- Finished floor levels are set no lower than 300mm above 2.19m AOD (above Ordnance Datum).

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason for condition 3

To reduce the risk of flooding to the proposed development and future occupants in line with section 9 of the Planning Practice Guidance of the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Advice to Local Planning Authority/Applicant

Flood proofing measures

We recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.

Consultation with your building control department is recommending when determining if flood proofing measures are effective.

Reference should also be made to the Department for communities and local Government publication 'Preparing for Floods' go to: <http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf> as well as the communities and local Government publication 'Improving the flood performance of new buildings' which can be viewed at: <http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>.

Void/stilt design

Voids or stilts should be designed to allow the free flow of water up to and including the 1 in 100 flood event, with an allowance for climate change. Openings should be designed to be as large as feasible within the proposed development. This is to reduce the risk of the void openings becoming blocked by debris during a flood which could subsequently increase risk to third parties.

It is imperative that the void space beneath the dwelling is kept free from debris throughout the lifetime of the development. This enables the voids to fulfil their flood storage role. The local planning authority should be satisfied that this is achievable and may wish to consider including a condition on any decision notice where permission is granted or requiring the applicant to enter into a legal agreement.

It should be demonstrated to the satisfaction of the local planning authority that the stilts/voids are a suitable form of mitigation.

The FRA should explain why other forms of floodplain compensation are not possible and

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provide the detailed design and maintenance regime for the proposed voids.

Safe access and egress

The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The Technical Guide to the National Planning Policy Framework (paragraph 9) states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

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cc Counterpoint Properties Ltd