

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

Our ref: HA/2021/123652/02-L01
Your ref: BR/242/21/OUT
Date: 07 December 2021

Dear Sir/Madam

**ADDITIONAL DOCUMENTS - OUTLINE APPLICATION WITH ALL MATERS
RESERVED EXCEPT ACCESS FOR THE DEMOLITION OF EXISTING BUNGALOW
TO FORM NEW ACCESS FOR 6 NO. DETACHED CHALET DWELLINGS
(RESUBMISSION FOLLOWING BR/124/21/OUT). TO REAR OF 94 - 100 HOOK
LANE BOGNOR REGIS PO22 8AT**

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

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

In light of the additional information provided by the applicant in the revised FRA (ref. November 2021, WSP), and letters dated 18/11/2021 and 02/12/2021, we are satisfied that our previous objection can be removed and recommend the below conditions to be included in the planning permission.

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning conditions are included.

Condition 1

The development shall be carried out in accordance with the submitted flood risk assessment (FRA) (ref. November 2021, WSP), letters dated 18/11/2021 and 02/12/2021, and the following mitigation measures:

- Finished floor levels shall be set no lower than 2.69m AOD metres above Ordnance Datum (AOD) as detailed in section 8.2.3 of the FRA
- Sleeping accommodation for the proposed residential units shall be located on the first floor of the buildings or above a 'safe refuge' as detailed in the letter dated 02/12/2021

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.

www.gov.uk/environment-agency

Cont/d.

- Flood plain compensatory storage shall be provided in accordance to the principles set out in section 8.2 of the FRA

Reason

To reduce the risk of flooding to the proposed development and future occupants.

Condition 2

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

Reason

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.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Advice to Applicant/LPA

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 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.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

