

Bronte Welham

From: Amanda Scholes on behalf of Planning.Responses
Sent: 01 February 2018 09:38
To: Planning Scanning
Subject: FW: Environment Agency Response to: CM/34/17/L
Attachments: PlanningProposal.rtf

-----Original Message-----

Sent: 31 January 2018 13:44
To: Planning.Responses
Subject: Environment Agency Response to: CM/34/17/L

The proposal has been reviewed and I enclose the Environment Agency's comments on:
Clymping Mill Climping Street Climping BN17 5RN

LPA ref: CM/34/17/L

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

Our ref: HA/2018/120087/01-L01
Your ref: CM/34/17/L
Date: 31 January 2018

Dear Sir/Madam

LISTED BUILDING CONSENT FOR DEMOLITION OF PREFABRICATED FORMER PRIVATE SCHOOL BUILDING AND MILL LODGE RESIDENTIAL UNIT. REFURBISHMENT OF EXISTING MILL TO RETAIN AND REFURBISH EXISTING DWELLING AND FLATS 1 & 2 (ADJOINING) WITH 2NO. ADDITIONAL DWELLINGS. REFURBISHMENT OF MILL COTTAGE AND MILL THATCH (UNITS 1 & 2) AND ERECTION OF 1NO. NEW-BUILD FLOATING POND-HOUSE WITHIN FEATURE POND. DEPARTURE FROM THE DEVELOPMENT PLAN. THIS APPLICATION ALSO LIES WITHIN THE PARISH OF LITTLEHAMPTON.

CLYMPING MILL CLIMPING STREET CLIMPING BN17 5RN

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:
Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

In particular, we have highlighted the following deficiencies within the submitted FRA.

Advice to Local Planning Authority

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



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According to the Environment Agency Map for Planning (Rivers and the Sea) the site is partially located in Flood Zone 2 and 3 (Medium and High Risk) with all the buildings shown to be in Flood Zone 1 (Low Risk).

When considering the effect of climate change, in particular the undefended 1 in 200 year flood event plus an allowance for climate change, the entire site is shown to be at risk of flooding, as suggested by the data provided in the Product 4 (Appendix B of the FRA). Section 2.6 of the FRA erroneously states that 3.76m AOD is the undefended 1 in 200 year flood event plus an allowance for climate change for node 7 (the closest to the proposed new pond house). From Table 1 in Appendix B of the FRA it is clear that this level is 4.76m AOD instead (node 7). Therefore the proposed finished floor levels for the new pond house of 4.06m AOD (Section 3.4 of the FRA) will be 0.7m lower than the design flood (undefended 1 in 200 year flood event, plus climate change). No further flood mitigation measures are proposed.

We would recommend finished floor levels to be set at least 300mm above 4.76m AOD.

Furthermore, the FRA fails to address the flood risk issues for the existing buildings, which are to be retained as residential dwellings (Climping Mill, Mill House, Mill Cottage and Mill Thatch). The FRA does not include details of finished floor levels of the existing buildings and how these relate to the design flood (undefended 1 in 200 year flood event, plus climate change), and how the residual risks will be managed to ensure the dwellings are made safe for their lifetime. No mitigation measures have been proposed to address the risk of including sleeping accommodation at ground floor, if the finished floor levels are below the aforementioned design flood. Neither are flood resilience measures proposed to be incorporated into the finished design. These could include barriers on ground floor doors, windows and access points, and arranging electrical services into the building at a high level so that plugs are located above possible flood levels.

Also no consideration have been made for the requirement of flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

Overall the FRA does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development, and does not demonstrate that the development is appropriate in an area of flood risk.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Safe access and egress

We recommend that you consult with your emergency planners or Fire and Rescue Service about whether safe access and egress, including a Flood Warning and Evacuation Plan, is vital to the development being considered appropriate in this location.

We do not 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.

Advice to Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Please do not hesitate to contact me on the number below should you have any queries.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

