

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: Wednesday, January 31, 2024 3:07 PM
To: David Easton <David.Easton@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: FP/274/21/OUT

Hi David,

In the light of new evidence and following further consultation we would like to provide an updated consultation response;

Bognor Regis Golf Club Downview Road Felpham PO22 8JD
Planning Reference: FP/274/21/OUT

Following newly submitted information and the recent flooding event in November 2023 we can confirm that we support the Lead Local Flood Authority in Objecting to this application.

Informative comments outside of this authorities jurisdiction;

The extent of flooding in the October / November events was significantly larger than that shown in the applicants hydraulic flood model and we therefore have limited confidence in the model results/output. We have estimated the flood extent using drone video footage and determined that approximately 40 – 50% of the proposed developed site area was flooded during the events. It is important to note is that although the events were not characterised as significant with respect to a single 24 hour period, the nearby rainfall gauge measured rainfall in excess of 400% of the average monthly measurement for this time period.

I understand that the Environment Agency (EA) representatives have provided a similar view, verbally communicating their concerns to our planning department. An objection from the EA is also anticipated.

It should also be noted that prior to the observed flood events, ADC employed at an independent consultant (JBA) to review the hydraulic flood model presented to the EA, due to our concerns over the known historic flooding on this site and the potential impacts of developing here. A number of recommendations were identified in terms of adjusting the model;

- *Update river reach bank levels and coefficients in the area of interest*
- *Extend high resolution mesh zone to cover all of the site plus a buffer area*
- *Storm duration testing is recommended to determine whether the existing storm duration is relevant for the development sites.*

These recommendations have not yet been incorporated in the model.

The following statement was also made during the review;

'The baseline model results provided on behalf of the applicant shows little fluvial flood risk predicted at the site. Therefore, the proposed elevation changes at the site result in no displacement of flood water or change to flood risk offsite. However, this review has concluded that remedial actions are required to both the baseline and proposed model scenarios before the impact of the development can be thoroughly concluded.

Flood Zone 3 at the site is largely due to flood risk predicted from tidal models. The impact of the proposed development on tidal flood risk to third parties has not been considered in the provided model or modelling report. The applicant states in the response to the Environment Agency's query on joint probability analysis that: "The EA's Emsworth to Littlehampton West Bank Coastal Modelling Study confirmed that the site (and Bognor) is protected up to the 1 in 200-year event and the standard of protection will be maintained in the future. Tidal risk to the site was therefore low and so no need to do joint probability assessment. The focus of the study was the fluvial and surface water flood risk". Arun District Council should consider if they are satisfied with this conclusion'.

With all this in mind, consideration should be given as to whether this area should now be classed as Flood Zone 3b in accordance with Arun District Council's SFRA which states "For the purpose of SFRA, the defended case 1 in 20-year annual probability (5% Annual Exceedance Probability) event informs the Functional Flood Plain within Arun

District. However, where flood outlines of Flood Zone 3b are not available, Flood Zone 3a should be considered as Flood Zone 3b unless, following further work as part of a sit-specific FRA, and in consultation with the Environment Agency, it can be proven as Flood Zone 3a." In addition, since the development of our SFRA the PPG has amended the definition of functional flood plain to start at 3.3% AEP (Annual Exceedance Probability).

In real terms, this means that the flood plain extent is likely to be larger than previously modelled, and therefore considered detrimental to a significant portion of the proposed development. Developing in the observed flood extents, would not only impact the development but also increase flood risk elsewhere.

Should you have any queries, please do not hesitate to contact us.

Kind regards,

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From: David Easton <David.Easton@arun.gov.uk>
Sent: Wednesday, January 31, 2024 2:35 PM
To: Paul Cann <Paul.Cann@arun.gov.uk>
Cc: Karl Mclaughlin <Karl.Mclaughlin@arun.gov.uk>
Subject: FP/274/21/OUT

Hi Paul,

I am aware that you are preparing a response on the above and wanted to make you aware that the deadline is 4 o'clock so we can get this included in the report before it is printed tomorrow morning.

Many thanks,

David Easton
Strategic Development Team Leader, Planning

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