

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

Our ref: HA/2019/121334/01-L01
Your ref: LU/126/19/PL
Date: 07 June 2019

Dear Sir/Madam

DEMOLITION OF THE EXISTING GARAGE BUILDING (B2 INDUSTRIAL USE) AND REDEVELOPMENT OF THE SITE PROVIDING 9NO C3 RESIDENTIAL UNITS - THIS APPLICATION AFFECTS THE CHARACTER AND APPEARANCE OF RIVER ROAD CONSERVATION AREA.

25 RIVER ROAD LITTLEHAMPTON BN17 5BZ

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

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change. The FRA does not therefore adequately assess the development's flood risks.

In particular, the FRA fails to:

- Consider finished floor levels in relation to flood levels and depths during the lifetime of the development taking in account climate change allowances.
- Ensure that no habitable rooms are placed below the 0.5% AEP 2115 flood level.

Overcoming our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the point highlighted above, they may also wish to apply for a product 4 data pack from the Environment Agency to inform the application.

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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We would advise that the proposed design for the river road site, with habitable accommodation placed on the first floor and above is adopted for the Terminus Road side of the development in a revised design.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA and we will respond within 21 days of receiving it.

Advice to Local Planning Authority/Applicant

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

Flood Proofing

We strongly recommend the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your Local Planning Authority's Building Control department. In the meantime, to find out more about reducing flood damage, you can visit the gov.uk webpages of the Planning Practice Guidance to the NPPF for Flood Risk and Coastal Change.

The following document may also be useful. Improving the flood performance of new buildings: improving the flood resilience of new buildings:

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

Flood warning and Emergency Response

We do 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 Planning Practice Guidance to the NPPF states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood, and to evacuate before an extreme flood, needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

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. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance.

Charged advice

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.

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

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency



cc The Planning Practice Ltd