



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

From: Anita Gardner

Sent: 20 February 2015 08:52

To: Planning.Responses

Subject: FW: LU/13/15/PL The Old Dairy site, Church Street, Littlehampton

Please treat as a consultee response

Anita Gardner | Principal Planner, Planning Department, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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

From: Guy Edwards

Sent: 17 February 2015 13:46

To: Anita Gardner

Subject: RE: LU/13/15/PL The Old Dairy site, Church Street, Littlehampton

Anita,

It is difficult to take this seriously however likely the risk is. If this site is so much at risk what about all the neighbouring properties and people; indeed a considerable area and communities of Littlehampton? But I suppose that is beside the point since it is the planning application that is the issue.

* I do not see any reference or detail of the applicant's " the proposed safe evacuation route".

* I do not require "any further information to be submitted due to the inadequacies of the Flood Risk Assessment highlighted above"

Your comment please

RegardsGuy

Guy Edwards | Emergency Planning Officer, Arun District Council |

Office: 3rd Floor, Bognor Regis Town Hall, Clarence Road, Bognor Regis, PO21 1LD



However the submitted Flood Risk Assessment still does not comply with the requirements of the NPPF. In particular it fails to;

1. Demonstrate how the risk of flooding can be mitigated in the event that flood defences fail or are overtopped, identifying measures to protect occupants and property. This may include flood resilience measures to impact the flooding.
2. Consider how people will be kept safe from hazards identified.
3. Consider the requirement for flood emergency planning including flood warning and evacuation for a range of flooding events up to and including the extreme event.

In the event of a breach in the planned defences, flood depths from a 0.5% (1 in 200) tidal event on this site could be as much as 1m on the access road. If climate change is taken into account over the lifetime of the development (figures for 2115) then this depth could be as much as 2m. A safe evacuation route to and from the site (in accordance with table 13.1 of FD2320/TR2 Flood Risk Assessment Guidance for New Development) could not be provided based on these levels.

Please note we do not normally comment on or approve the adequacy of flood emergency response and evacuation 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.

The Planning Practice Guidance to the NPPF (Paragraph 057) places responsibilities on LPAs to consult their Emergency Planners with regard to specific emergency planning issues relating to new development. In all circumstances where warning and evacuation are significant measures in contributing to managing flood risk, we will expect LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

We therefore strongly recommend consulting with your Emergency Planners on :

- the proposed safe evacuation route and
- whether they require any further information to be submitted due to the inadequacies of the Flood Risk Assessment highlighted above.

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

From: Anita Gardner

Sent: 17 February 2015 12:49

To: Guy Edwards

Subject: LU/13/15/PL The Old Dairy site, Church Street, Littlehampton

Dear Guy,

I have received a response to my consultation with the Environment Agency regarding the above application who have advised that the submitted FRA is inadequate with regard to mitigation, keeping people safe from hazards and emergency planning. They have suggested consulting with you and I would appreciate your comments within the next 14 days Regards Anita Gardner