

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

**Our ref:** HA/2025/127004/01-L01  
**Your ref:** LU/141/25/PL  
**Date:** 05 September 2025

Dear Planning Officer,

**PARTIAL DEMOLITION OF NUMBER 57 RIVER ROAD, CHANGE OF USE & RE-DEVELOPMENT TO PROVIDE A FLATTED DEVELOPMENT COMPRISING 9 NO APARTMENTS WITH PRIVATE AMENITY SPACE, PARKING & CYCLE STORAGE, INCLUDING THE PARTIAL DEMOLITION OF THE ADJACENT BOUNDARY WALL TO PROVIDE A NEW PEDESTRIAN ACCESS & THE CREATION OF A FLOATING PONTOON WITH RESIDENT MORNING SPACES (RESUBMISSION FOLLOWING LU/251/21/PL). THIS APPLICATION AFFECTS THE CHARACTER & APPEARANCE OF THE LITTLEHAMPTON RIVER ROAD CONSERVATION AREA & IS IN CIL ZONE 4 (ZERO RATED) AS FLATS.**

**57 RIVER ROAD, LITTLEHAMPTON, BN17 5DD.**

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 the absence of an adequate flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

**Reason**

Ensure reasons are site-specific and related to planning policy. They can be provided as free text or based on the following prompts:

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. In particular, the FRA fails to:

Adequately consider how a range of flooding events (including extreme events) will affect people and property and take the impacts of climate change into account

· Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 0.5% AEP CC, with 600mm freeboard as recommended in government guidance. Consequently, the development proposes inadequate raised finished floor levels

## **Overcoming our objection**

A previous application on this site (Ref LU/251/21/PL, EA Ref HA/2021/123510/01) was deemed acceptable with conditions by the Environment Agency in 2021, based on the fact that proposed finished floor levels were to be set at a minimum of 300mm above the design flood level (1 in 200 CC (2115)).

Since this time, government guidance has been extensively updated and now recommends that finished floor levels should be a minimum of 600mm above the estimated river or sea flood level. The FRA for this application proposes the same floor levels as in the 2021 application but does not adequately justify why these are acceptable. It only states that the chosen floor level is suitable for a 1 in 300 event, with no evidence of how this was deduced or relates to the design flood level, or any consideration of whether this includes allowances for climate change.

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

## **Advice to Applicant**

### **Environmental permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river

- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact our National Customer Contact Centre on [REDACTED] (Monday to Friday, 8am to 6pm) or by emailing [REDACTED].

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

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**

[REDACTED]  
[REDACTED]

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

[REDACTED]  
Sent: 05 September 2025 14:32

To: Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

Subject: Environment Agency Response to: LU/141/25/PL

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The proposal has been reviewed and I enclose the Environment Agency's comments on:  
57 River Road, Littlehampton, BN17 5DD.

LPA ref: LU/141/25/PL

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