



From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>

Sent: 05 July 2021 09:25

To: Andrew Wood <Andrew.Wood@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>

Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Subject: RE: Planning Consultation - LU/151/21/PL

Dear Sir/ Madam

Demolition of existing car garage and the erection of 2 no. two-storey residential buildings comprising 5 no. flats with associated works. This site affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats. (LU/151/21/PL)

**25 River Road,
Littlehampton,
BN17 5BZ**

Thank you for bringing this application to my attention.

I have no issue with the development I just felt it necessary to prevent the dissemination of misinterpreted information.

The FRA provided by the applicant states;

"The Beachy Head to Selsey Bill Shoreline Management Plan (SMP2)(South Downs Coastal Group,2006) designation for defence lines at Littlehampton (Unit 18) is to "hold the line" over the long term period to 2105 which means that the proposals will remain protected by flood defences currently and over the lifetime of the development.", p.3.

"The Beachy Head to Selsey Bill Shoreline Management Plan (SMP2)(South Downs Coastal Group,2006) designation for defence lines at Littlehampton (Unit 18) is to "hold the line" over the long term period to 2105 which means that the proposals will remain protected by flood defences currently and over the lifetime of the development. It is assumed the defences will continue to be maintained thereafter until 2121, but freeboard will be provided to provide an allowance, should the defence policy change between 2105 and 2121.", p.17

The SMP policy does not mean that the proposal will remain protected by flood defences. The site is offered a standard of protection as described in the FRA but the SMP does not guarantee that the proposal will remain protected by flood defences. This is supported by the information contained within the SFRA which the applicant has included in the latter half of their report **"Local policy and guidance – The east**

bank defences in Littlehampton were constructed by the Environment Agency, and post-construction these are privately maintained. Although the Environment Agency and Arun District Council have permissive powers to maintain defences, they do not hold responsibility to carry out maintenance or improvement works.”, p.34

Furthermore, part of the SMP has been lifted and highlighted using bold text “**Thus, there is justification, economically, to maintain defences and hold the line**”, p.35, which when combined with the earlier statement “*The Beachy Head to Selsey Bill Shoreline Management Plan... which means that the proposals will remain protected by flood defences...*” gives a false impression of the future risk. Please refer to 1.1.1 **Guiding Principles** of the SMP. Copied verbatim for reference;

“One significant issue is the inappropriateness of certain policies which, when tested in more detail with a view to being implemented, may be found to be unacceptable or impossible to justify either economically or technically. It is therefore important that the SMP is realistic, given known legislation and constraints, both human and natural, and not promise what cannot be delivered. There will be no value in a long-term Plan which has policies that are driven by short-term politics and cannot be justified once implementation is considered several years in the future. Equally, whilst the affordability of each policy has been considered (Appendix H – Economics) in a broad brush fashion, the Plan’s adoption by the local authorities involved does not represent a commitment to fund their implementation; similarly the adoption of a particular policy does not guarantee that funding (from any route) will be available. Ultimately, the economic worth of policy implementation must be considered in the context of budgetary constraints (whether private or government funding), and it cannot be guaranteed that budgets will be available for all policies. The Coastal Defence Strategies, which come after this Plan will examine in much greater detail the economic viability of the policies set out herein. A system of Outcome Measures is in place to assess nationally the priority of each scheme put forward against national targets set by central Government; this is only possible once an outline scheme has been produced, making available costings and benefits in greater detail than examined in the Plan – this is outside the scope of the SMP.”

In summary, the SMP is an aspirational document and the “Hold the Line” policy is subject to funding.

Regards,

Karl McLaughlin

Coastal Engineer, Engineering Department

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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 01 July 2021 10:54

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Cc: Andrew Wood <Andrew.Wood@arun.gov.uk>; Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/151/21/PL

Engineers Comments Regarding Surface Water Drainage

The site is located in Flood Zones 3 (predominately), 2 and 1. Therefore the EA should be consulted. The Coastal Engineer (copied in) should also be consulted for clarification of the SMP Policy for the area (referred to in the FRA).

The applicant has supplied no winter site investigations (groundwater monitoring and infiltration testing), we would need to see these before disregarding infiltration as an option (as the flood risk is predominately tidal in a defended area). It is encouraging to see the use of green roofs suggested as these are wholly appropriate in a flood zone.

However, no detailed surface water design has been submitted, therefore, if you are minded to approve the application please apply the following conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

PCENG D2

"Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity."

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

And the accompanying informative:

INFORM D

"Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm event plus 40% on stored volumes (allowance for climate change) between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year storm event plus 40% on stored volumes. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers."

Supplementary guidance notes regarding surface water drainage are located here Council on Arun District Councils website. A surface water drainage checklist is available on Arun District Councils website, this should be submitted with a Discharge of Conditions Application."

Kind Regards

Sarah Burrow
Engineering Assistant, Engineering Services

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E: sarah.burrow@arun.gov.uk



Current working pattern: Monday 8am-2:30pm, Tuesday 8am-5:30pm, Wednesday 8am-5pm, Thursday 8am-5:30pm, Friday 8am-11:30am.

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 17 May 2021 16:49

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: LU/151/21/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: LU/151/21/PL

Registered: 10th May 2021

Site Address: 25 River Road Littlehampton BN17 5BZ

Grid Reference: 502490 102086

Description of Works: Demolition of existing car garage and the erection of 2 no. two-storey residential buildings comprising 5 no. flats with associated works. This site affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats.

The Council have received the above application.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 18th June 2021. You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning.

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can the leaflet how to respond to planning applications <https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://www.planningportal.co.uk/info/200207/appeals> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Andrew Wood

Planning Officer- Arun District Council

Telephone: 01903 737768

Email: andrew.wood@arun.gov.uk

PLCONSULT (ODS) 2020