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

Our ref: [redacted]
Your ref: LU/219/11/

Date: 09 September 2011

Dear Sir/Madam

ERECTION OF 2 NO. 3 BEDROOM HOUSES. (RE-SUBMISSION FOLLOWING LU/18/11).
LAND REAR OF 27-29B SURREY STREET LITTLEHAMPTON BN17 5BD

Thank you for consulting us on the above application.

We would normally require that finished floor levels be set a minimum of 300mm above the predicted modelled flood depth. Although this freeboard has not been provided, we do not wish to object on this basis.

The proposed development will only be acceptable if the following measure(s) as detailed in the Flood Risk Assessment submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition 1 of 1
The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures detailed within the FRA:
Finished floor levels are set no lower than 1.2m above existing ground level.

To reduce the risk of flooding to the proposed development and future occupants in line with the requirements of PPS 25.

Advice
The application site lies within Flood Zone 3 defined by Planning Policy Statement 25 as having a high probability of flooding. Development classified as more vulnerable is only appropriate in these areas following application of the Sequential Test and Exception Test.

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The current defences on the Arun are not of a sufficiently high standard, offering only a 1 in 75 year standard of protection. Suitable defences should offer a 1 in 200 year (0.5%) level of protection to allow safe access and egress.
The Flood Risk Assessment (FRA) submitted does not contain any assessment of the hazard to safe access and egress routes during the 0.5% probability flood. Our modelling shows a flood depth of up to 1 metre at this location. Using the figures provided in PPS 25 to predict the effects of sea level rise, the predicted flood depth in 2115 would be over 1.2 metres. This depth would be as a result of overtopping of the existing defences, and does not assume their failure or breach.

Even assuming there is no velocity, 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.

Assuming that the required flood defences will be forthcoming, the probability of flooding is likely to be low. The LPA may wish to consider whether or not risk management measures that lie outside of our remit could be an acceptable way of managing the residual risk of flooding by enabling people to avoid the potential flood hazards. The Flood Risk Assessment proposes several such measures, including all living accommodation to be set at 1.2 metres above the existing ground level, flood resilient construction techniques, high level services, and non return valves on the drainage. These measures may enable occupants to remain safe inside the development, although the anticipated duration of flooding is unknown.

If the LPA is not satisfied that, taking into account all relevant considerations, that the proposed measures would enable people to avoid flood hazards then planning permission should be refused.

Yours faithfully

Keely Mowatt
Development & Flood Risk Engineer

Direct e-mail planning.southdowns@environment-agency.gov.uk

cc B C Building Consultants Ltd

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