

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

Our ref: HA/2020/122604/01-L01
Your ref: LU/247/20/PL
Date: 15 October 2020

Dear Sir/Madam

PARTIAL DEMOLITION OF EXISTING BUILDING, RETENTION OF BOUNDARY WALL & STREET FACADE, PARTIAL DEMOLITION OF BOUNDARY WALL TO INCORPORATE NEW PEDESTRIAN GATEWAY & GATE, ERECTION OF 6 NO. FLATS IN 2 BLOCKS CONNECTED BY SHARED STAIR & LIFT CORE, ON SITE PARKING YARD FOR 8 NO. CARS & 8 NO. CYCLES & SPACE FOR COMMUNAL REFUSE & RECYCLING BINS. THIS APPLICATION AFFECTS THE CHARACTER & APPEARANCE OF THE LITTLEHAMPTON RIVER ROAD CONSERVATION AREA & IS IN CIL ZONE 4 AND IS CIL LIABLE

57 RIVER ROAD LITTLEHAMPTON BN17 5DD

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(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the development's flood risks. In particular, the FRA fails to:

- provide site specific tidal flood levels in mAOD
- take the impacts of climate change into account
- Assess finished floor levels for the dwelling against the site specific tidal flood levels (including climate change) and include sufficient freeboard.
- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.

www.gov.uk/environment-agency

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evacuation of people for a range of flooding events up to and including the extreme event

Overcoming our objection

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 consult us on any revised FRA and we will respond within 21 days of receiving it.

Advice to Local Planning Authority/Applicant

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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 Risk Data

The data used in the FRA is out of date (2013 and older). Please provide an FRA using the most up-to-date data available.

We do not provide FRAs. However, our Customers and Engagement team can provide the requested site specific flood levels including climate change. Please contact SSD Enquiries under [REDACTED] We suggest requesting Product 4 which includes flood zones and levels, defences and storage areas, areas benefiting from defences, statutory main river designations, historic flood event outlines and more detailed information from our computer river models. Please find attached the link for more precise information:

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#get-information-to-complete-an-assessment>

Your local planning authority should have undertaken a strategic flood risk assessment (SFRA), where information on flood risk locally, which may inform your FRA, has been collated. Please contact your local planning authority to determine what information may be available.

Charged Advice Service

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

Mrs Sophie Brown
Sustainable Places Planning Advisor



cc John Pardey Architects