



Littlehampton R4 Flood Defences
Planning Statement
Revision A – 8 September 2017

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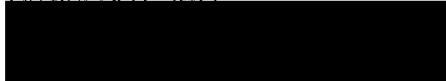
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Quality Assurance

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<i>Date</i>	<i>8 September 2017</i>
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Approvals

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Contents

1. Introduction	1
2. Scheme Driver	2
3. Characteristics of the Location	4
4. Extent of proposed development	5
5. Requirements for E.I.A screening	6
6. Planning policy	7
7. Heritage	8
8. Construction programme	9
9. Materials and construction management	10
10. Traffic management and access	11
11. Ecology	14
12. Noise and vibration prevention	17
13. Flood risk	19
14. Groundwater	20
15. Protecting neighbours	21
16. Site restoration	22
17. Conclusion	23

1. Introduction

- 1.1 This Planning Statement is in support of a planning application relating to the installation of a small segment of flood defence wall outside 47 River Road (Riverside Autos), Littlehampton.
- 1.2 This section of tidal wall along the frontage of 47 River Road (approximately 26m in length) was not completed as part of previous extensive flood defence works carried out by the Environment Agency at the East bank of the River Arun, which were approximately 2.5km in length from the harbour mouth upstream.
- 1.3 The works are intended to close the gap in the existing flood defences and provide improved flood immunity for the full study area consistent to a 1 in 300 year standard of defence.

2. Scheme driver

- 2.1 The Environment Agency previously worked in partnership with Arun District Council to produce the River Arun to Ardur Flood and Erosion Management Strategy.
- 2.2 The strategy, adopted in 2010, highlighted the area subject to this planning application as an area that would derive significant benefit from the provision of enhanced flood defences.
- 2.3 The strategy identified, as the preferred option, the raising of flood defences to provide a consistent 1 in 300 year standard of defence for the full study area.
- 2.4 Previously in 2013 the Environment Agency (EA) undertook the installation of flood protection works along the River Arun in execution of planning permission LU/152/13.
- 2.5 The previous downstream works were part of the Environment Agency Flood Protection Scheme, and included sheet pile wall and reinforced concrete, with a glass flood balustrade to a height of +4.8m OD.
- 2.6 The previous upstream works (completed by the landowner of Lot 47) were part of the redevelopment of part of Lot 47 River Road (Riverside Wharf), and included a brick retaining wall with a concrete capping beam to a height of +4.9 OD.
- 2.7 During both these phases, the small section of the wall outside 47 River Road (Riverside Autos) was not installed.
- 2.8 This small section of wall was going to be completed by the landowner but, due to changes in circumstances, this is now no longer possible and the Environment Agency has elected to continue the necessary works in a similar configuration to the completed downstream works.
- 2.9 The installation of the small section of flood protection wall outside 47 River Road (Riverside Autos) will therefore tie into the previous flood protection works completed.
- 2.10 The previous works undertaken by the Environment Agency and the landowner are identified in Figure 1.

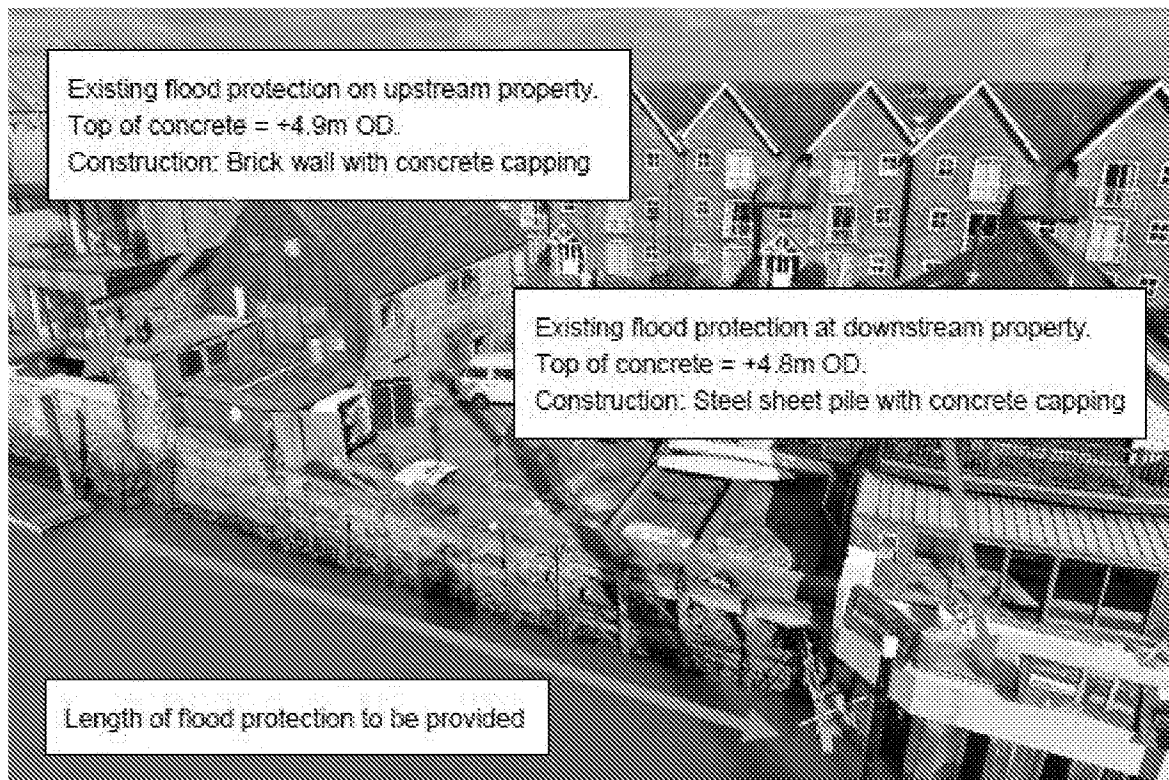


Figure 1 - Area of Works

3. Characteristics of the location

- 3.1 The proposed development of a small section of flood defence wall is located outside 47 River Road (Riverside Autos) and would require approximately 26.7 metres of sheet pile wall with a concrete capping beam and fill behind.
- 3.2 The site occupies an area of approximately 0.3 hectares and occupies an urban location off River Road which is at risk from flooding because of being located on the northern bank of the lower River Arun.
- 3.3 The current site comprises an existing building occupied by Riverside Autos, within an otherwise predominantly open yard.
- 3.4 Intertidal mud/sand habitat is dominant within the immediately adjacent tidal reach of the River Arun, which flows north-west to south-east.
- 3.5 The rear elevation of the Riverside Autos building is set back from the river wall and clad in old corrugated sheet steel.
- 3.6 The existing sea defence along the face of 47 River Road consists of an ageing timber retaining wall, as well as some concrete, brickwork and blockwork.
- 3.7 The existing timber elements have been in position at the site for some time and have been subjected to coastal conditions, including salt water, marine borer attacks and continuous changes in tidal levels leading to degradation of the timber elements and erosion of the soil behind.
- 3.8 The current flood defence wall on this site is in a poor state of disrepair and the new flood wall proposed is not considered to in any way undermine or damage the Conservation Area, or the setting of any Heritage Assets.
- 3.9 A condition investigation of the site was conducted on the 21st October 2014 by a structural engineer from RSK and found that:
- 3.10 *"The timber wall is in extremely poor condition with damaged / lost horizontal boards, damaged tie rods, rotting timber piles and the formation of large voided areas beneath the yard area where the river has washed out the subgrade material.."*
- 3.11 *"The concrete capping beam has moved in position and temporary works comprising steel beams laid across the yard and resin fixed to the capping beam are in place to restrain further movement."*
- 3.12 The urban centre of Littlehampton lies immediately east of the site, and the land to the north and north east of the site entirely comprises residential and industrial development.
- 3.13 The surrounding land use is comprised of residential properties either side and behind.

4. Extent of proposed development

- 4.1 The planning application proposes the use of an approximate 26.7 metre length segment of steel sheet pile wall, embedded into the sub strata, with a concrete capping beam.
- 4.2 Fill will then be placed behind the wall to infill the gap between the existing timber retaining structure and the new sheet pile wall.
- 4.3 The capping beam will also be connected to the existing downstream capping beam and form a closed connection with the upstream brick wall and concrete capping beam.
- 4.4 The proposed works are described within the project drawings (Appendix A) and the Design Basis Report (Appendix B).

5. Requirements for EIA screening

- 5.1 The proposed works are not considered to constitute Environmental Impact Assessment (EIA) development, as outlined in letter correspondence to Arun District Council dated 22nd August 2017 (Appendix C). Approval of the Environmental Impact Assessment is pending and due latest Tuesday 12th August 2017.

6. Planning policy

- 6.1 The Development Plan consists of the Arun District Local Plan 2003. Paragraph 214 of the National Planning Policy Framework (NPPF) ensures specific policies can carry weight according to their consistency with the various policies of the NPPF.
- 6.2 NPPF paragraph 216 also confirms that weight can also be given to policies in emerging plans following publication. The emerging Arun District Local Plan 2011-2031 is therefore of material consideration.
- 6.3 The proposed works are compliant with key policies of the existing Arun District Local Plan Plan 2003 including policy GE10 on tidal flooding and coastal defence, GE19 on Coastal Protection and Sea Defence Work and GE29 on Nature Conservation across the District; and key policies in the emerging plan including policies HER SP1 on Historic Environment, WD4 on Sea/Coastal Protection and HER DM3 on Conservation Areas.
- 6.4 The proposed development is considered to comply with relevant local and emerging local plan policies in that the development will have no materially adverse impact on the Littlehampton River Road Conservation Area, or the visual amenity or character of the local area. It will also be helping to reduce (rather than increase) flood risk and will have no unacceptably adverse impacts on the environment or biodiversity.
- 6.5 The proposed development is also consistent with the NPPF including its policies in section 10 on meeting the challenges of climate change, flooding and coastal change, 11 on conserving and enhancing the natural environment and 12 on conserving and enhancing the historic environment.

7. Heritage

- 7.1 The design of the proposed flood defence will minimise any visual impact on the surrounding area and compliment the existing flood defence configurations either side of the site.
- 7.2 The flood defence wall has also been designed in a way which does not undermine the setting of the existing structures on the site.
- 7.3 It is considered that the proposed defences will not have any significant visual impact on the Littlehampton River Road Conservation Area or its setting, or on any locally important existing buildings currently on the site or in the area as seen from the river or elsewhere.
- 7.4 Overall the flood defence project as a whole will be providing long-term protection for residential and commercial premises in Littlehampton, highways infrastructure, Littlehampton Railway line and station, industrial areas around Littlehampton Harbour and recreational assets including public rights of way, public slipways and public open spaces. The increased flood protection will also protect Littlehampton's commercial core and a large number of listed and locally designated buildings.
- 7.5 With the site situated within the Littlehampton River Road Conservation Area, the shoring up of flood defences on this site will help protect heritage assets in the area from flooding and maximise the positive impact of the existing flood defences already in situ either side of the application site.

8. Construction programme

- 8.1 It is currently anticipated that the construction phase will take approximately 4-8 weeks and that the works will be programmed to commence in Winter 2017 (anticipated late October/early November 2017, start subject to planning consent).
- 8.2 Normal working hours for the works are 07.00 to 18.00 – Mon to Fri, and Sat 08.00 to 13.00.
- 8.3 No construction activities are undertaken outside of these hours, without prior written agreement of the Project Manager.
- 8.4 The following processes are envisaged to need to take place (further details are provided within the buildability statement, located with the DBR – Appendix B):
- Driving of sheet piles;
 - Installation of drainage layer within pans of sheet piles;
 - Initial stage of fill provided between the existing reclamation slope and sheet pile walls.
 - Capping beam constructed utilising framing off the initial fill, and temporary works.
 - Fill to ground level and compaction.

9. Materials and construction management

- 9.1 As works are to be undertaken adjacent to/within a marine environment, works on site will be conducted in accordance with PPG5 - Pollution Prevention Guidelines for works and maintenance in or near water (EA 2007) to prevent potential negative impacts to HPI Intertidal Mudflats and Running Water - Brackish.

10. Traffic management and access

Vehicle movements during construction:

- 10.1 The sheet Piles are intended to be installed via a jack up barge which will limit the number of vehicles that will need to access the site via River Road during the construction phase.
- 10.2 The sheet Piles will be delivered to the Tarmac wharf, located upstream of the construction site and either floated to the barge, or placed on the barge prior to the barge being mobilised to the site.
- 10.3 The access route for the sheet Piles is shown in Figure 2, titled Sheet Pile Access Route.

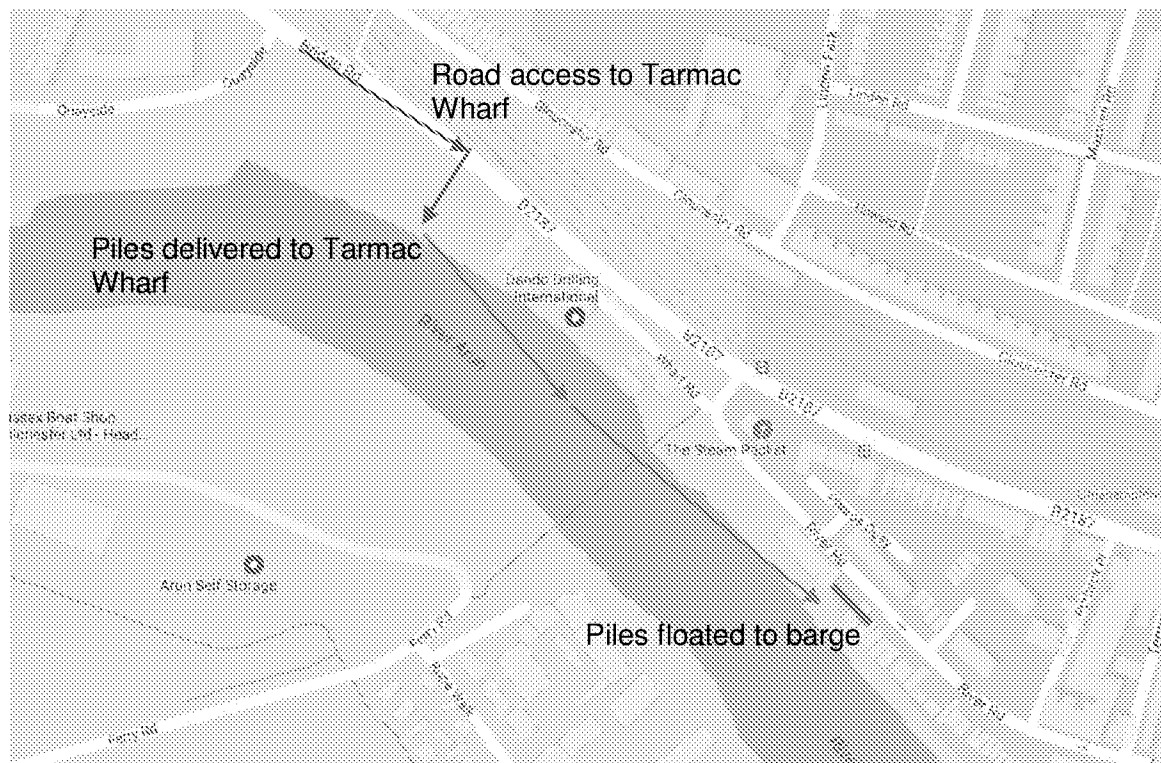


Figure 2 - Sheet Pile Access Route

- 10.4 Moving sheet piling along the river could disrupt boat movement. Therefore, all movements will be agreed with Littlehampton Harbour Board and with priority given to commercial shipping. An exclusion zone around the barge will also be set up in accordance with requirements of the Littlehampton Harbour Board.
- 10.5 With these measures in place, the impacts on road and river users during construction will be slight, but cannot be eliminated completely.
- 10.6 The completed scheme will have significant benefits for roads, the railway and public access by reducing the risk of disruption due to tidal flooding.

- 10.7 As the sheet piles will be driven by the equipment located on the floating barge, it is expected that the piles will be delivered to the nearby Tarmac Wharf and floated to the barge.
- 10.8 Table 1 below shows the estimated number of vehicles, which are expected to require access to the site.

Table 1 - Indicative Vehicle Numbers

Type	Description	Est. Volume	Unit	Required Number of Loads
Establishment	Welfare delivery	1	No.	1
Establishment	Welfare removal	1	No.	1
Establishment	Site container	1	No.	1
Establishment	Site container	1	No.	1
Fill Material	20 tonne lorry, 450 tonne of soil in bulk condition	450	tonne	23
Construction Equipment	Sheet piles	3	No.	3
Reinforcement	Delivery of reinforcement	4	No.	4
Concrete	6 m ³ tonne concrete mixer, 100 tonne of concrete	100	tonne	8
Personnel Access	Personnel Access – 6 days a week for 6 weeks and 7 days a week for 2 weeks (crew of 6)	180	No.	180 (cars)
Total (loads only) + 20% contingency				50

- 10.9 Access to the site during deliveries is intended to follow the path shown in Figure 3:

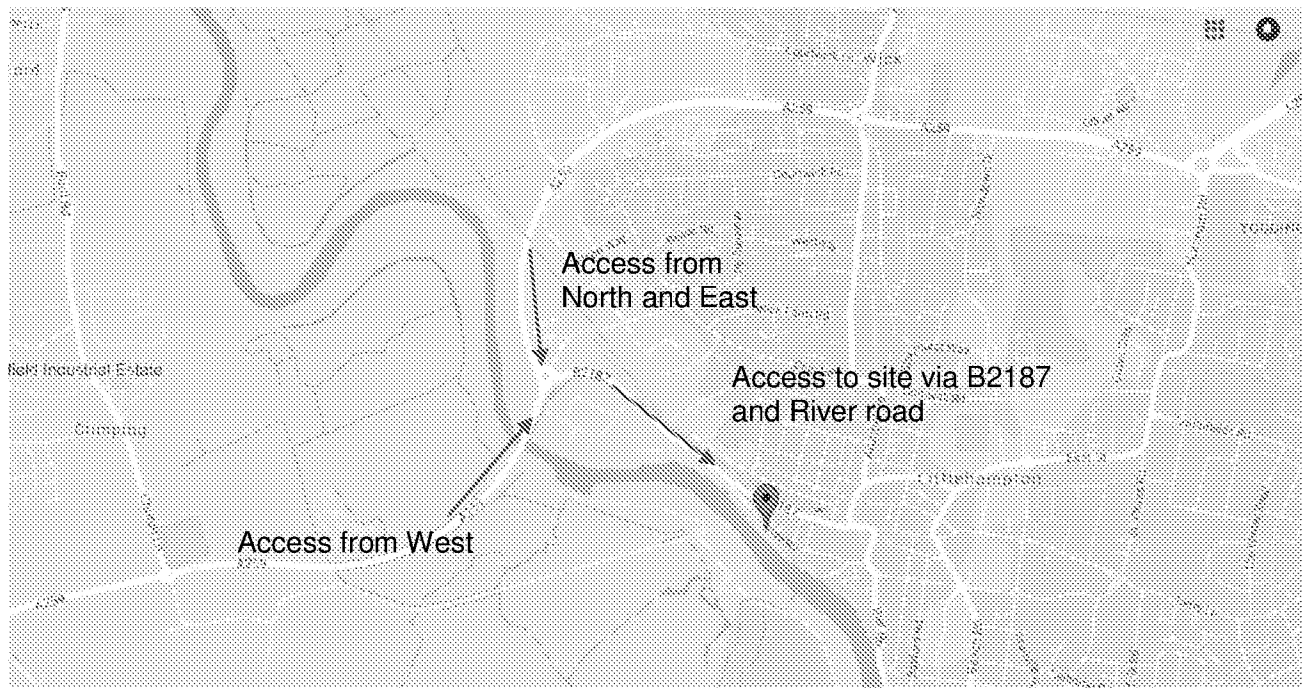


Figure 3 - Access Route to Site for Construction Vehicles (Source: Google)

- 10.10 On completion, operational traffic movements to the site is not envisaged to increase beyond existing levels to the yard and autos building, unless for any future unexpected necessary maintenance of the wall.

11. Ecology

- 11.1 A Preliminary Ecological Survey (PES) of the site, which includes a River Corridor Survey of the riverine habitat upstream and downstream of the site, has been undertaken by Keystone Ecology.
- 11.2 The survey forms part of the Planning Application (Appendix C) and can be read in full in conjunction with the rest of the submitted forms, plans, reports and documentation forming the planning application submission.
- 11.3 The survey addresses potential ecological constraints arising from both terrestrial and aquatic environments.
- 11.4 The site boundary and immediate foreshore were directly accessed for the purpose of the survey. Survey of the wider area upstream and downstream of the works and on the opposite bank was undertaken where access was feasible, or through the use of high-powered binoculars from vantage points on both banks.
- 11.5 The river corridor survey provides a detailed evaluation of a watercourse and riparian habitat and vegetation within 50 metres of the river bank. Surveyors identify and mapped the geography, hydrology and general ecology of the watercourse and associated habitats, together with an appraisal of its potential to support protected species and/or the presence of invasive non-native species.
- 11.6 Both the Phase 1 Habitat Survey and the River Corridor Survey extended approximately 100 metres upstream and 200 metres downstream of the proposed works as access restrictions allowed.
- 11.7 The River Corridor survey methodology was based on the River Corridor Survey guidelines produced by the National Rivers Authority in 1992 (River Corridor Survey guidelines produced by the National Rivers Authority in 1992. Bristol.)
- 11.8 The works concluded with the preparation of a Preliminary Ecological Appraisal (PEA) report. The PEA was undertaken in compliance with BS42020:2013 and CIEEM Guidelines for Ecological Report Writing (2015).
- 11.9 The aims of the Preliminary Ecological Appraisal report were to:
 - Provide the results of an Extended Phase 1 Habitat Survey and desk study;
 - Identify key ecological constraints to the propose development;
 - Inform design/working methods to allow significant ecological effects to be avoided or minimised;
 - Identify if any further ecological surveys were needed;
 - Allow any necessary mitigation or compensation measures to be developed;
 - Form the basis for agreeing the basis for agreeing the scope of an EcIA with the relevant consultees (if required) and
 - Highlight any opportunities for ecological enhancement of the site.
- 11.10 The following ecological features were relevant to the report:

- Statutory and local designated wildlife sites;
- Habitats of Principal Importance (HPI) in England or local Biodiversity Action Plan (BAP) habitats and networks of these habitats;
- Ancient woodland inventory sites;
- Important hedgerows (as defined by the Hedgerows Regulations 1997);
- Veteran trees;
- Legally protected species;
- Species of Principal Importance (SPI) or local BAP species;
- The wider green infrastructure resource and;
- Invasive species.

11.11 A summary of the PEA is provided in the following sections

Bat Roosting Inspection Report:

- 11.12 Keystone Ecology undertook a Bat Roost Inspection Survey of Buildings at 47 River Road (Appendix D). This was because although the site is an actively used garage abutting the River Arun which the proposed flood defence wall does not directly impact, the installation of the wall could result in indirect disturbance through increased noise and vibrations during the construction phase.
- 11.13 The report was produced in accordance with Chapter 11 of Collins (2016) and report writing guidelines produced by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2015).
- 11.14 The aim of the survey was to ascertain:
- The presence/absence of bat roosts/potential bat roosts;
 - Status of roosts if present, including the type of roost, likely species and their numbers;
 - Presence of potential roost features (PRFs);
 - Whether a European Protected Species (EPS) licence is likely to be required to ensure legal compliance; and;
 - Which type of mitigation measures would need to be employed (if any).
- 11.15 The bat roost inspection survey was in accordance with the current bat guidelines (Collins, 2016) and involved an internal and external examination of the buildings, including any roof spaces or cellars.
- 11.16 The report concluded that there were no signs of bats present in the building and that the building only has a moderate bat roost potential (summer only) and were considered unlikely to support hibernating bats. In the event bats are present on site, they are already habituated to high levels of frequent disturbance. A short term increase in noise/vibrations will not prevent bats from continuing to function on site or in the locality.
- 11.17 The report also concluded that the cavities within the existing flood defence wall were unlikely to support hibernating bats due the cavities being submerged during high tides.
- 11.18 No further surveys were required or recommended.

- 11.19 The Bat Roost Inspection Report has been submitted as part of the planning application (Appendix D) and can be read in full in conjunction with the other forms, plans, reports and documentation submitted which form the planning application submission.

Opportunities for Biodiversity Enhancement:

- 11.19 The installation of bird boxes and bird perches to encourage the nesting of bird species within the vicinity of the site has been identified as a possible biodiversity enhancement opportunity. This is because the boundary is situated within an urban area usually largely devoid of nesting opportunities. Such opportunities may include a Wagtail/Dipper nest box (Eco Dipper - Wagtail Nest Box) which could accommodate Pied Wagtail, a species recorded within the wider area during the surveys.
- 11.20 The installation of vertipools to assist in enhancing the intertidal rockpool zone has been identified as a possible biodiversity enhancement opportunity. Such opportunities may see vertipools installed on the face of the sheet piles at various heights to provide habitats for marine dwellers.
- 11.21 The installation of bat boxes to encourage the nesting of bat species within the vicinity of the site has been identified as a possible biodiversity enhancement opportunity.
- 11.22 The nest boxes may be mounted within the site boundary, or at a nearby location within the vicinity of the works depending on discussions with the MMO, district council, landowners and Environmental Agency.
- 11.23 A biodiversity checklist has been completed and attached to this planning statement as Appendix E.

Ecological Assessment:

- 11.21 The site's ecological value has been evaluated broadly following guidance issued by the Chartered Institution of Ecology and Environmental Management (CIEEM 2013) which ranks the nature conservation value of a site according to geographic scale of reference: international, national, regional, county/metropolitan, district/borough, local/parish or of value at the site scale. In evaluating the nature conservation value of the site, the following factors were considered: nature conservation designations, species/habitat rarity, naturalness, fragility and connectivity to other habitats.
- 11.22 The site is not subject to any nature conservation designations and none will be affected by proposed works. No rare or habitats of principal importance have been identified within the site perimeter.
- 11.23 The majority of the site contains habitats that have very limited potential to support protected species, for example hardstand and existing building and structures.
- 11.24 The site is currently considered of low value within the immediate vicinity of the site; containing very common habitats of low ecological value.

12. Noise and vibration prevention

- 12.1 The existing noise along the riverbank comes from a range of sources typical of a town centre location, including road traffic.
- 12.2 Temporary increases in noise during construction are unavoidable, but these increases will be short term and only during the day time.
- 12.3 Measures to minimise any nuisance to nearby residents will be considered and the works have been programmed to avoid work during the main tourist season.
- 12.4 Piling is also likely to give rise to vibration, and where this is close to properties this is expected to cause some impact. To minimise this, resonance-free vibrators will be utilised which have successfully reduced the effects of piling on buildings in similar circumstances elsewhere.
- 12.5 Calculations using British Standard methods to determine the consequences has indicated no effects on the fabric of building but some possible disturbance to residents. As a precautionary measure, buildings will be monitored for vibration so that any effects can be identified if they develop, and subsequent measures taken to avoid damage. Property owners and residents will be kept fully informed on the nature and timing of the works.
- 12.6 In addition to impacts on land, it is important to consider the impacts upon the marine environment as well, as the Arun is an important river for various species.
- 12.7 Discussions held with the fisheries experts in the Environment Agency have revealed that they concur with the research undertaken that there is no discernible effect upon fisheries from Vibro-piling.
- 12.8 As a result they are of the view that there is no constraint in terms of the majority of the piling works upon the fish stocks in the River.
- 12.9 Several safeguards exist to minimise the effects of noise and vibration during the construction, including:
 - Restriction of normal working hours to 07.00 to 18.00 Monday to Friday and Saturday 08.00 to 13.00.
 - The adoption of Best Practicable Means as defined in the Control of Pollution Act 1974, which is usually the most effective means of controlling noise from construction sites. This generally entails the employment of good site practice to minimise the noise and vibration impacts from the works
 - If available, using shielded piling hammers which will reduce noise levels generated from hammer piling by in the order of 10dB
 - Using screening around piling equipment and maintain plant in good operational condition with all engine covers and noise control measures as provided in place
 - Keeping local residents and property owners fully informed about the nature and timing of the works, including compound locations and traffic controls, via such means as newsletters.

- Adoption of Considerate Contractors Scheme and having a representative available on site during working hours to answer queries or address any concerns expressed.
- Careful selection of equipment, for example any compressors brought to site will be supersilenced or sound reduced models fitted with acoustic enclosures or any pneumatic tools will be fitted with silencers or mufflers wherever practicable.
- All plant and equipment will be properly maintained and operated in accordance with manufacturers' recommendations and in such a manner as to avoid causing excessive noise.
- Equipment will be shut down when not in use for a period longer than 5 minutes.
- No vehicles will wait or queue on public highways with engines running.
- Deliveries will try to be restricted to daytime hours, during the working hours of the sites, and will be routed so as to minimise disturbance to local residents; care will also be taken when unloading deliveries and vehicles will be prohibited from waiting on site with their engines running.
- Where elevated levels of vibration are predicted to occur, and vibro- or percussion piling techniques are to be employed, pre construction condition surveys will be undertaken to ascertain the stability of the structure and its potential resistance to vibration. If the property is shown to be susceptible, alternative piling methods should be employed where ground conditions permit, and in any case, regular vibration monitoring shall be undertaken at or near the foundations of sensitive buildings to ensure that adequate levels of control are being employed.
- These will help to control the noise levels produced by the construction works on the site, but at best will reduce noise impacts from the construction works by 5dB. With respect to the potential for unavoidable impact piling, the Environment Agency have advised that such work will be acceptable in daylight hours during the winter, (Nov – March) since the vast majority of Sea Trout move at night.
- Further measures that will be considered to mitigate the impacts of noise for both human and marine receptors include slow start techniques which minimise the initial pulse from vibration operations.
- The restriction of construction activities to avoid sensitive times of the year for tourists and ecological interests, and restriction of the working days and hours where possible for residents and ecological interests, coupled with application of further measures as listed above, will help to avoid adverse impacts or reduce noise levels and nuisance for all sensitive receptors.

12.10 It is envisaged that there will be no residual impacts on fish. Neither press nor vibro-piling will result in any adverse impacts during any time of the year. Coupled with the short duration of the works, good site practice and advance and continuing communication through the project with residents, nuisance will be reduced to a minimum.

13. Flood risk

- 13.1 The application is supported by an updated Flood Risk Statement (Appendix F), following on from the previous applications for the flood defence works in the area which the proposed segment of wall will be connecting to.

14. Groundwater

- 14.1 The design of the river defence wall takes into consideration any impact on groundwater in order to prevent the build up of groundwater behind any of the piles.
- 14.2 To facilitate the prevention of groundwater building up behind the piles, each of the sheet piles will have a series of holes drilled through the face of the piles.
- 14.3 As the piles are laterally loaded and the toe of the pile is defined during the design, the location of these holes is usually readily known, therefore enabling prefabrication if preferred by the Contractor.
- 14.4 Prefabrication of the holes is preferred and beneficial because the steel does not usually need to be cut in or above water, limiting the potential for foreign containments entering the water body.
- 14.5 The completed scheme will have a major beneficial effect by providing a better standard of flood protection. It is not anticipated to have any effect on water levels outside of those that would occur under sea level rise, and will not result in any increase in flood risk

15. Protecting neighbours

- 15.1 No negative impact is envisaged from the operation of the new flood defence wall.
- 15.2 Whilst local residents may be subject to some minimal noise disturbance during construction from machinery and vehicle movements, this will be minimised by good working practices such as avoidance of night-time working.
- 15.3 Vehicle movements through River Road will be managed by the contractors to minimise any disruption for local residents and vehicle movements along the road is being minimised by the use of a barge to carry some equipment down the river where feasible.
- 15.4 The proposed works will have significant long-term benefits for the neighbours and the Littlehampton River Road Conservation Area as a whole by protecting properties from flooding.

16. Site restoration

- 16.1 All areas temporarily impacted by the proposed development will be reinstated to their existing condition upon completion of the development.

17. Conclusion

- 17.1 The proposed development is essential work in order to ensure that the area is protected from flooding in the long-term and in order to maximise the benefits of existing flood defences already in situ by closing the current gap in the defences at the application site.
- 17.2 The proposed development is considered to be deemed appropriate, necessary and sensitive development within the Littlehampton River Road Conservation Area and compliant with both local and national existing and emerging planning policies.
- 17.3 There are also considered to be no other material planning considerations which would prevent development at this site from receiving planning consent.

Appendix A (Project Drawings)

Appendix B (Design Basis Report)

Appendix C (Preliminary Ecological Survey)

Appendix D (Bat Roosting Inspection)

Appendix E (Biodiversity Checklist)

Appendix F (Flood Risk Statement)

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