

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

Our ref: HA/2013/114986/01-L01
Your ref: LU/329/13/PD
Date: 26 November 2013

Dear Damian

**PRIOR NOTIFICATION FOR CHANGE OF USE FROM B1 (BUSINESS) TO
RESIDENTIAL
3 & 5 CHURCH STREET LITTLEHAMPTON**

Thank you for consulting the Environment Agency on the above planning application. The site is located in Flood Zone 3 defined as having a high probability of flooding. We are pleased to see that this application has been accompanied by relevant information relating to flood risk.

However having reviewed the submitted Flood Risk Assessment and the information provided it is unclear whether ground floor flats are being proposed.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reasons

The FRA submitted with this application does not comply with the requirements set out in paragraph 9 the Technical Guide to the National Planning Policy Framework. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In the event of a breach in the planned defences, flood depths from a 0.5% (1 in 200) tidal event on this site could be in excess of 1m on the proposed site. If climate change is taken into account to 2115 then this depth could be in excess of 2m in proposed dwellings.

Therefore we would consider that sleeping accommodation on the ground floor may pose an unacceptable risk to occupants. In addition 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.

In addition, the submitted FRA fails to

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

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1. Demonstrate how the risk of flooding can be mitigated in the event that flood defences fail or are overtopped, identifying measures to protect occupants and property.
2. Take the impacts of climate change into account over the lifetime of this development, i.e. 100 years
3. Consider how people will be kept safe from flood hazards identified
4. Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

If you have any queries or require further information please contact me. We would also be happy to discuss our response in more detail with the Applicant.

Yours sincerely

Catherine McLeod
Sustainable Places Planning Advisor
Environment Agency

