

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

Our ref: HA/2014/115217/01-L01
Your ref: LU/335/13
Date: 20 January 2014

Dear Anita

**SUB-DIVISION OF EXISTING TWO BEDROOM APARTMENT TO PROVIDE 2NO.
ONE BEDROOM APARTMENTS
63 SOUTH TERRACE LITTLEHAMPTON BN17 5LG**

Thank you for consulting the Environment Agency on the above planning application which we have reviewed in relation to flood risk.

Environment Agency Position

We object to this application because it has failed to meet the requirements of the second part of the flood risk Exception Test. In the absence of an acceptable flood risk assessment (FRA), we recommend refusal of planning permission until a satisfactory FRA has been submitted.

Reasons

The Technical Guide to the National Planning Policy Framework (NPPF) requires the Exception Test to be applied in the circumstances shown in tables 1 and 3. Paragraph 102 of the NPPF makes clear that both elements of the Test must be passed for development to be permitted. Part 2 of the Test requires the applicant to demonstrate in a site specific flood risk assessment that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

Development classified as more vulnerable is only appropriate in Flood Zone 3 where the Exception Test has been applied in full and has been passed. In this instance the submitted flood risk assessment (FRA) fails to:

- Identify that the site is within Flood Zone 3
- Identify mitigation measures that could be taken to protect occupants and property in the event of an extreme flood event.
- Take into account the effects of climate change over the lifetime of the development (ie 100 years).
- Identify safe access/egress routes to an area of high ground.
- Consider the effect of a range of flooding events including extreme events on people and property.

The FRA submitted with this application does not comply with the requirements set out

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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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.

The application site is shown to be within Flood Zone 3, a high flood risk area in accordance with NPPF. In addition, the current defences on the River Arun only offer a 1 in 75 year standard of protection.

The predicted 1 in 200 year tidal flood level for Littlehampton at today's date is 3.73mAOD. Local land levels are understood to be in the region of 2mAOD. Flood depths at this location could therefore be as much as 1.7 metres of water. If climate change is taken into account over the lifetime of the development (5.0mAOD in 2115) then these depths could be as much as 3 metres.

We have grave reservations as to whether an FRA could address these issues satisfactorily, and the applicant should seriously consider this before engaging the services of a flood risk consultant. Given the flood depths we would consider that sleeping accommodation on the lower 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.

Please note that from 2 January 2014 the South East Region of the Environment Agency began charging for detailed planning advice to planning enquiries that we receive from our customers. If the applicant would like any further detailed advice we would be happy to provide this subject to a charge. Further information on this service is available on our website at: <http://www.environment-agency.gov.uk/research/planning/33580.aspx>

If you have any queries or require further information please contact me.

Yours sincerely

Catherine McLeod
Sustainable Places Planning Advisor
Environment Agency

