[redacted]

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From: Adam King[redacted]
Sent: 13 March 2025 17:05
To: Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: LU/36/25/PL 7 Roman Acre - Flood Risk Assessment Response

Hi Harry,

We noted that there was an Environment Agency objection dated 11th March 2025 put up on the Arun website today. This notes a number of issues with the submitted FRA.

We have provided this information to CEP who produced the Flood Risk Assessment and asked them to provide a response to the specific points raised which is attached.

We believe that the Environment Agency has not reviewed the Flood Risk Assessment in sufficient detail as all of the points raised appear to have been dealt with within the submission.

The attached Designers Response (dated today) sets out clearly where in the current FRA the points in the objection are dealt with, including the flood events reviewed, the impact of climate change and how the finished floor levels were specifically set to mitigate against the future year climate change adjusted flood event.

As such, given the submitted FRA deals with all of the points that the Environment Agency objection raises, this should be sufficient for this objection to be removed.

As there was no direct correspondence details for Mrs Sophie Brown, could I please ask that you provide this response to the Environment Agency without delay to ensure that the objection is removed?

I look forward to confirmation that you have received this additional information.

Thank you.

Kind Regards

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Director

ECE Architecture

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[redacted]

Designer's Response

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Project	**Roman Acre, Wick, Littlehampton**
Project Number	**23953**
Comments Received from	Environment Agency Letter 11 March 2025
Date of Response	13 March 2025

	Comment / Query	**Designer's response**
	The submitted FRA (Flood Risk Assessment, On behalf of Jeff Djevdet, Project Number 23953, dated January 2025) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:	
1	• consider how a range of flooding events (including extreme events) will affect people and property	Sections 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9 of the submitted the Flood Risk Assessment v1.0 clearly notes the flood level data supplied by the Environment Agency and how the current climate change allowances and sea level rise have been applied to the 2012 data supplied together with the site specific flood levels for the years 2012, 2025 and 2125 detailing the 1:1,000 and 1:200 flood levels for each year, the climate change allowances having been applied to the current year 2025 and 2125.

Comment / Query		Designer's response
		Section 5 of the Flood Risk Assessment v1.0 discussed the flooding potential to the site from the Future Year 200 year tidal events with climate change and confirms the risk to the site is low with negligible risk to the dwelling even in the event the defences fail. The Flood Risk Assessment considers all forms of flooding. Only tidal flooding poses a potential risk to the site. With tidal flood risk there will be no sea level rise or any residual risk to the surrounding catchment if the development proceeds. The Flood Risk Assessment has clearly considered the appropriate range of flooding events including extreme events and how they affect the site.
2	• take the impacts of climate change into account	Sections 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9 note the flood level data supplied by the Environment Agency and how the current climate change allowances and sea level rise have been applied to the 2012 data supplied together with the site specific flood levels for the years 2012, 2025 and 2125 detailing the 1:1,000 and 1:200 flood levels for each year, the climate change allowances havi been applied to the current year 2025 and 2125 levels. The Flood Risk Assessment has clearly taken the impacts of Climate Change into account. At the rear of this response is the sea level rise calculatiuon for reference.
3	Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 0.5% event including climate change to 2125. Consequently the development proposes inadequate finished floor levels including freeboard.	Section 6.2 details Future Flood Risk Mitigation and confirms finished floor levels at ground floor level will be set above the future year plus climate change flood level of 4.833m AOD at 4.850m AOD. It also notes first floor sleeping accommodation at 7.55mAOD, 2.717m above the 2125 1:200 year tidal flood level. Both of these mitigate risk to the dwelling and its occupants. The site is located in an area benefitting from flood defences as set out in Section 4.3 of the Flood Risk Assessment.

Comment / Query		Designer's response
		The existing defences have crest heights at 4.4m and 4.8m AOD and are within an area of 'hold the line' and 'maintain / replace' policy in regard to those defences. The risk of removal / failure of those defences is extremely low. The climate change adjusted future predicted flood level is 4.833m AOD for the Higher Central Risk and therefore 33mm higher that the closest existing defence and 433mm higher than he lower defence at 4.4m AOD. There is a residual risk of overtopping of the defences. It is unlikely even if the defences overtopped that there would be any wave action at the extreme of the tidal flood extent, where this site is located, and therefore no requirement for freeboard to be applied to the finished floor levels. The finished floor levels have been set above the climate change adjusted future 2125 1:200 year tidal flood level such that the finished floor level would remain above that future climate change adjusted tidal flood event if the defences were to completely fail. The finished floor levels proposed are appropriate to mitigate the low risk of tidal flooding at this development.
Overcoming our objection To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above		We have detailed / clarified above where the information requested is already contained within the submitted Flood Risk Assessment.

EA Base Data from [illegible] model Sea Level [illegible] m AOD

Seal Level Rise https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

2000	to	2035	[illegible] mm
2036	to	2065	[illegible] mm
2066	to	2095	[illegible] mm
2096	to	2125	[illegible] mm

2012	3.700 m AOD

Year	[illegible]	Higher central
2013	[illegible]	3.706 m AOD
2014	[illegible]	3.711 m AOD
2015	[illegible]	3.717 m AOD
2016	[illegible]	3.723 m AOD
2017	[illegible]	3.729 m AOD
2018	[illegible]	3.734 m AOD
2019	[illegible]	3.740 m AOD
2020	[illegible]	3.746 m AOD
2021	[illegible]	3.751 m AOD
2022	[illegible]	3.757 m AOD
2023	[illegible]	3.763 m AOD
2024	[illegible]	3.768 m AOD
2025	[illegible]	3.774 m AOD
2026	[illegible]	3.780 m AOD
2027	[illegible]	3.786 m AOD
2028	[illegible]	3.791 m AOD
2029	[illegible]	3.797 m AOD
2030	[illegible]	3.803 m AOD
2031	[illegible]	3.808 m AOD
2032	[illegible]	3.814 m AOD
2033	[illegible]	3.820 m AOD
2034	[illegible]	3.825 m AOD
2035	[illegible]	3.831 m AOD
2036	[illegible]	3.840 m AOD
2037	[illegible]	3.849 m AOD
2038	[illegible]	3.857 m AOD
2039	[illegible]	3.866 m AOD
2040	[illegible]	3.875 m AOD
2041	[illegible]	3.883 m AOD
2042	[illegible]	3.892 m AOD
2043	[illegible]	3.901 m AOD
2044	[illegible]	3.909 m AOD
2045	[illegible]	3.918 m AOD
2046	[illegible]	3.927 m AOD
2047	[illegible]	3.936 m AOD
2048	[illegible]	3.944 m AOD
2049	[illegible]	3.953 m AOD
2050	[illegible]	3.962 m AOD
2051	[illegible]	3.970 m AOD
2052	[illegible]	3.979 m AOD
2053	[illegible]	3.988 m AOD
2054	[illegible]	3.996 m AOD
2055	[illegible]	4.005 m AOD
2056	[illegible]	4.014 m AOD
2057	[illegible]	4.023 m AOD
2058	[illegible]	4.031 m AOD

EA predicted Sea Level Rise

Area of England		2000 to 2035 (mm)	2036 to 2065 (mm)	2066 to 2095 (mm)	2096 to 2125 (mm)
Anglian	Higher central	5.8	8.7	11.6	13
South east	Higher central	5.7	8.7	11.6	13.1
South west	Higher central	5.8	8.8	11.7	13.1
Northumbria	Higher central	4.6	7.5	10.1	11.2
Humber	Higher central	5.5	8.4	11.1	12.4
North west	Higher central	4.5	7.3	10	11.2

2059	4.040 m AOD
2060	4.049 m AOD
2061	4.057 m AOD
2062	4.066 m AOD
2063	4.075 m AOD
2064	4.083 m AOD
2065	4.092 m AOD
2066	4.104 m AOD
2067	4.115 m AOD
2068	4.127 m AOD
2069	4.139 m AOD
2070	4.150 m AOD
2071	4.162 m AOD
2072	4.173 m AOD
2073	4.185 m AOD
2074	4.197 m AOD
2075	4.208 m AOD
2076	4.220 m AOD
2077	4.231 m AOD
2078	4.243 m AOD
2079	4.255 m AOD
2080	4.266 m AOD
2081	4.278 m AOD
2082	4.289 m AOD
2083	4.301 m AOD
2084	4.313 m AOD
2085	4.324 m AOD
2086	4.336 m AOD
2087	4.347 m AOD
2088	4.359 m AOD
2089	4.371 m AOD
2090	4.382 m AOD
2091	4.394 m AOD
2092	4.405 m AOD
2093	4.417 m AOD
2094	4.428 m AOD
2095	4.440 m AOD
2096	4.453 m AOD
2097	4.466 m AOD
2098	4.479 m AOD
2099	4.492 m AOD
2100	4.506 m AOD
2101	4.519 m AOD
2102	4.532 m AOD
2103	4.545 m AOD
2104	4.558 m AOD
2105	4.571 m AOD
2106	4.584 m AOD
2107	4.597 m AOD
2108	4.610 m AOD
2109	4.623 m AOD
2110	4.637 m AOD
2111	4.650 m AOD
2112	4.663 m AOD
2113	4.676 m AOD
2114	4.689 m AOD
2115	4.702 m AOD
2116	4.715 m AOD
2117	4.728 m AOD

2118	4.741 m AOD
2119	4.754 m AOD
2120	4.768 m AOD
2121	4.781 m AOD
2122	4.794 m AOD
2123	4.807 m AOD
2124	4.820 m AOD
2125	4.833 m AOD