

6 February 2018

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



By email

The Civil Engineering Practice
11 Tungsten Building
George Street
Fishergate
Sussex
BN41 1RA

Dear Sirs

The Bungalow Southdown Nursery, Old Mead Road, Littlehampton

We have received a copy of the letter response from the Environment Agency in relation to the Planning Application LU/3761/17/OUT for the above site and respond as follows.

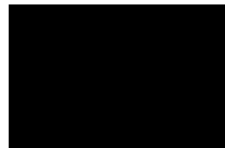
This response should be read in conjunction with information contained within the Flood Risk Assessment dated 10 November 2017 and addresses the points raised in the Environment Agency letter of 12 December 2017 and in the same order.

Sections 1.3 and 4.1 of the FRA note the location of the site within an area designated as being at risk of tidal flooding. Subsection 4.1.6 further notes that based on analysis of the ground levels the site currently sits outside present day 1 in 200 year tidal flood events. It follows that the site is not currently at risk of tidal flooding.

Subsections 4.1.7 and 8.1.2 note that the site is also within an area benefiting from flood defence. The policy with regard to flood defence for that area is to 'hold the line'. The Environment Agency working in partnership with Arun District Council, West Sussex and Littlehampton Harbour Board have carried out improvement works to the tidal flood defences in the area between 2013 and 2015. Parts of the flood defence height have been raised with further works taking place over winter 2017 according to the latest update in November 2017.

We note the comment that floor level should be raised above the 1 in 200 year flood level plus an allowance for climate change. It is proposed that no sleeping accommodation is provided at ground floor level for the proposed development. This will result in sleeping areas being set above the 1 in 200 year tidal flood level including an allowance for climate change.

We note the comment relating to localised flooding affecting the adjacent historic rubbish tip to the west of the site, however at the time of preparing the Flood Risk Assessment both the Environment Agency and the Lead Local Flood Authority confirmed that they did not hold any historic data for the site area other than what was mentioned in the report.



We note the comments relating to existing raised wall and acknowledge that any works within 16m of the Black Ditch will be subject to separate Permits for Flood Risk Activities.

Whilst the use of under floor voids is not a preferred option with appropriate design and covenants this has been used as an effective means to maintain natural flow paths and flood storage. We propose that this be controlled by suitable Planning Condition to ensure delivery on site.

Subsection 8.2.14 refers to the use of flood resistant and resilience methods as part of the proposed development construction. We propose that this is controlled by the use of appropriately worded Planning Condition.

We acknowledge the requirement for a Flood Evacuation Plan and suggest that this is put in place and agreed with the Planning Authority prior to first occupation of the proposed development. Subsection 8.2.13 notes that the area is covered by the Environment Agency's Flood Warning Service and that the development and future residents will be signed up to the service.

As discussed in Section 8.1 of the Flood Risk Assessment it is deemed that the Sequential Test was passed by Arun District Council positively considering the site as part of HELAA and identified for residential development.

The proposed development can be delivered in a sustainable location and in compliance with all current Planning Policies. The proposal does not increase flood risks elsewhere and aims to address much required residential accommodation in the area. The development can be controlled by suitable Planning Conditions.

I trust the above fully addresses any concerns with regard to the suitability of the proposed development site, however, please do not hesitate to contact me should you need further information.

Yours sincerely

Bava Sathan

cc Clare Bartlett - Batcheller Monkhouse