

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

Our ref: HA/2017/119996/01-L01
Your ref: LU/376/17/OUT
Date: 12 December 2017

Dear Sir/Madam

OUTLINE APPLICATION WITH ALL MATTERS RESERVED FOR DEMOLITION OF A BUNGALOW & OUTBUILDINGS & ERECTION OF UP TO 25 NO. DWELLINGS OF WHICH 30% WILL BE AFFORDABLE, WITH ASSOCIATED OPEN SPACE. DEPARTURE FROM THE DEVELOPMENT PLAN.

THE BUNGALOW SOUTHDOWN NURSERY OLD MEAD ROAD LITTLEHAMPTON BN17 7PU

Thank you for the consultation on the above application, please quote our reference on all correspondence.

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:

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

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 particular, the submitted FRA fails to

- Take into account the tidal flood risk, which for this area is the main source of flooding; particularly the tide lock impact on the proposed development site.
- The finished floor levels should be set above the 1 in 200 year flood event plus

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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an allowance for climate change.

It should also be noticed that we are aware of localised historic flooding connected to the adjacent historic rubbish tip at the west of the site.

The raised wall mentioned in section 8.2.6 of the FRA is not classified as a flood defence. Any works within 16 metres from the Black Ditch (e.g. extension of the existing wall) will need a Permit for Flood Risk Activities (formerly known as Flood Defence Consent prior to 06 April 2016) before any works can take place. For further information please visit: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Furthermore the proposal to incorporate under floor voids is not a preferable option, as this would increase the risk of blockages under the buildings. We also recommend that the owner/occupants sign up to the Environment Agency Flood Warning Service and have a flood evacuation plan, and consideration should be made for flood resilience and resistance measures to incorporate in the final design.

Our response to this planning application is on the understanding that the Local Planning Authority is satisfied that the Sequential Test has been adequately demonstrated to the requirements set out in the National Planning Policy Framework (NPPF) Paragraph 101.

This means that before proceeding to a determination, the Local Planning Authority must apply the Sequential Test; that is, it must consider whether the applicant has demonstrated and sufficiently justified that no alternative sites are available in a lower flood risk zone.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

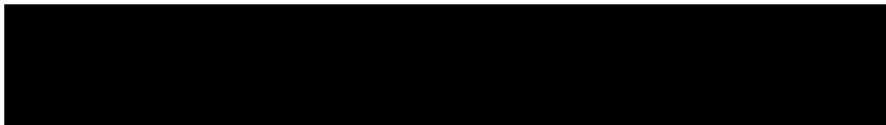
As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please

provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency



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