

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

Our ref: HA/2018/120170/01-L01
Your ref: LU/376/17/OUT
Date: 28 February 2018

Dear Sir/Madam

[ADDITIONAL INFORMATION] 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

We **maintain our objection** for the following reasons:

Although the site is shown to be outside the present day 1 in 200 year flood outline for the defended scenario, our Flood Map for Planning (Rivers and the Sea) does not take into account defences and it shows the site to be in a tidal and fluvial flood zone 3.

According to the Product 4 information we provided, the undefended present day 1 in 200 year flood level for the site is 2.48m AOD with depths up to 0.93m. This means that the site is at risk from tidal flooding if defences were to be breached or overtopped. Furthermore the tide lock impact on the development site has still not being taken into account in the submitted FRA and additional information.

Even though the site may currently benefit from flood defences, and this should be identified and referred to in the FRA, you must also address the residual risk of those defences failing or being overtopped. Our advice to local planning authorities and developers is to design their flood mitigation measures to ensure that the development is safe for its lifetime (now and in the future) without the reliance upon existing

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

Cont/d..

infrastructure.

According to the latest Arun District Council Level 1 SFRA (2016), the site is shown to be partially in Flood Zone 3b (functional Flood Plain). No development should be permitted in Flood Zone 3b. Functional flood plain is vital for the conveyance and storage of floodwater in fluvial systems. Development within this zone will potentially impede the flow of floodwater as well as result in a loss of flood storage, increasing flood risk both within the area and further downstream.

In regards to the maintenance of current flood defences, the Lower Tidal River Arun strategy (LTRAS) outlines recommendations for managing flood risk in the Arun Valley, from Pallingham Weir to Littlehampton and Ford for the next 100 years. In SU6 (Arundel to Littlehampton), the defences will be maintained until year 50, after which maintenance will be withdrawn. Maintaining the defences for the medium term directly affects flooding in the adjacent SUs (5 and 7), as floodwater would otherwise flow into these SUs and potentially cause flooding to properties behind the defences.

In SU7, the Black Ditch and associated structures will be maintained, which will manage flood risk for the medium term. In the long term the risk of tidal flooding will increase, and maintenance activities and the new flanking defence will not be sufficient to manage this risk.

The use of stilts or voids is not considered floodplain compensation, but rather mitigation of risk by design. The use of stilts reduces the impact on the development but does not guarantee that the floodplain will be retained in the same way as a compensation scheme (which is a form of risk substitution). It will need to be demonstrated why a conventional scheme is not possible to be implemented, as well as a plan being agreed between the applicant and the local planning authority to ensure that the voids are managed and maintained for the lifetime of the development.

It is our understanding that inclusion of sites in the Housing & Economic Land Availability Assessment (HELAA) does not mean that development can be permitted without further consideration of the Sequential Test. Therefore the Local Planning Authority need to be satisfied that the Sequential Test has been adequately demonstrated to the requirements set out in the National Planning Policy Framework (NPPF) Paragraph 101.

Overcoming our objection

The applicant can overcome our objection by submitting an FRA which addresses the deficiencies highlighted above and demonstrates that the development will be safe and appropriately flood resilient/ resistant.

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.

Please do not hesitate to contact me on the number below should you have any queries.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency



End