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From: Rabone, Anna [REDACTED]
Sent: 16 March 2020 11:50
To: Planning.Responses <Planning.Responses@arun.gov.uk>

[REDACTED]

Subject: Ref: LU/48/20/PL

Dear Planning team,

Please find our response to planning application LU/48/20/PL (Southdown Nursery, Old Mead Road, Littlehampton) attached.

Thank you very much.

Kind regards,
Anna

Anna Rabone
Sustainable Places Advisor | Solent and South Downs Area
Environment Agency | Chichester Office, Oving Road, Chichester, West Sussex, PO20 2AG

[REDACTED]



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

Our ref: HA/2020/122070/01-L01
Your ref: LU/48/20/PL
Date: 16 March 2020

Dear Sir or Madam,

DEMOLITION OF 1 NO. BUNGALOW & OUTBUILDINGS & ERECTION OF 22 NO. DWELLINGS WITH ASSOCIATED PARKING & OPEN SPACE.

SOUTHDOWN NURSERY, OLD MEAD ROAD, LITTLEHAMPTON, BN17 7PU.

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA), we **object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA (Monson, February 2020) does not comply with the requirements for site-specific flood risk assessments, as set out in the Planning Practice Guidance to the National Planning Policy Framework for Flood Risk and Coastal Change. The FRA does not therefore adequately assess the flood risks posed by the development, with reference to the specific points below:

- **Flood plain compensation**

It is proposed to lower ground levels by 0.320m across the open space area to provide flood plain compensation. It is stated that 965m³ will be lost and that 973m³ will be provided as compensation. The compensation calculations are not shown in the FRA, and therefore it is not possible to determine if the quoted numbers are correct and enough flood plain compensation storage has been provided.

To ensure the principles of level for level compensation are fully adhered to, the

Applicant should provide a series of cross sections of the area where the loss of flood plain occurs, and also of the correspondent flood plain compensation area.

It would be useful if the Applicant could provide additional tables showing the level for level compensation calculations. In particular for each slice the following should be considered:

- the start and finish levels of each slice in mAOD;
- the depths of each slice in metres;
- the loss of flood plain (including the area of the slice in square metres and the volume in cubic metres);
- the flood plain compensation (including the area of the slice in square metres and the volume in cubic metres); and
- the difference between the flood plain compensation volume and the loss.

As a result of the proposed development, it must be ensured that there is no loss of flood flow or flood storage capacity for floods up to the design flood, including an appropriate allowance for climate change.

- *VOIDS under buildings*

The proposal to incorporate under floor voids is not a preferable option for flood plain compensation. Issues with voids include trapped debris and blockages under the buildings and silt accumulations, which is difficult to clean down after a flood event and can potentially lead to public health issues. On some occasions, due to the size of the void openings, maintenance could be entirely restrictive.

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.

- *MAINTENANCE of current flood defences*

Even though the site may currently benefit from flood defences, and this should be identified and referred to in the FRA, the Applicant must also address the residual risk of those defences failing or being overtopped.

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 Strategy Unit 6 (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 Strategy Units (5 (Arundel) and 7 (Black Ditch)), as floodwater would otherwise flow into these Strategy Units and potentially cause flooding to properties behind the defences.

In Strategy Unit 7 (Black Ditch), 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.

- *Tide lock*

As the Black Ditch (main river) flows into the River Arun through a triple-flapped outfall, tide-locking can occur on the Black Ditch from this point. The FRA should take this into account, assess this risk and provide suitable mitigation measures.

From local knowledge, we are aware that in some occasions it will not be possible for surface water outfalls to discharge into the Black Ditch for up to 7-10 days. Although the Local Planning Authority's Drainage Engineers are the appropriate function to comment on surface water, we have some reservations in regards to the dry basin storage located in Flood Zone 3. It will need to be demonstrated that the surface water system is designed to ensure that it is not affected by its location within Flood Zone 3 extents.

West Sussex County Council and Arun District Council's Drainage Engineers should be satisfied with the drainage strategy and calculations for the site.

Overcoming our objection

To overcome our objection, the Applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us on any revised FRA submitted, and we will respond within 21 days of receiving it.

Advice to the Local Planning Authority

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant permission against our advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

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.

Advice to the Applicant

Flood Risk Activity Permit

Any works in, under or over, or within 8 metres from the top of the bank of the Black Ditch (e.g. new surface water outfalls, etc.) will need a Flood Risk Activity Permit from us under the Environmental Permitting (England and Wales) Regulations 2016, before any works can take place.

For further information please visit: <https://www.gov.uk/guidance/flood-risk-activities->

environmental permits.

Flood warning

We recommend that the owners/occupants sign up to our Flood Warning Service. Our flood warning service is a free service. Further details about signing-up can be found here – <https://www.gov.uk/sign-up-for-flood-warnings>.

We also recommend that the property has a flood evacuation plan in place.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully,

Miss Suz Greenwood
Planning Advisor, Environment Agency

