

FAO Clare Bartlett
Batcheller Monkhouse
New Bartram House
3-5 Swan Court
Station Road
Pulborough
RH20 1RL

20th March 2020 - By e-mail only

Dear Claire,

Southdown Nursery, Old Mead Road, Littlehampton, BN17 7PU

Further to the recent correspondence from the Environment Agency of 16th March 2020 regarding the above site, we have the following comments to make in respect of the EA letter. For simplicity, we have headed our response to correspond with the EA letter:

Reasons: We have previously followed the guidance and advice of the Environment Agency, provided in their pre-planning advice of 16th August 2019. Each of the items highlighted in the advice was addressed and therefore we believe that our FRA is compliant with the requirements.

Flood Plain Compensation: The FRA already outlines the principles of the flood plain compensatory measures and any detailed sections and external levels design is carried out at the detailed design stage and should therefore be secured by condition as it normally would be. Undertaking too much detailed design at an early stage can have risks, such as locking in detailed levels, which may impact other design disciplines and not being able to change the levels without going back to planning.

Voids Under Buildings: The EA have misunderstood the purpose of using standard beam and block flooring and that it has to be ventilated. The beam and block flooring creates around a 200mm ventilated void under the floor, allowing any rising ground water or other flood water to dissipate. The void under the floor is NOT factored in to any gain in flood storage, in fact it is calculated as a loss.

Maintenance of Current Flood Defences: This information was not provided in the pre-planning advice from the EA and should have been. However the document does state that areas SU5 and SU7 will have the benefit of improved flood defences and flood risk management. This is to be put in place before of the ongoing maintenance to SU6 defences are withdrawn after year 50.



Tide Lock: Tide locking over this period of time seems very unrealistic. Tides come up, but they also return to low tide. The drainage strategy does however provide an additional 150 cubic metres of surface water storage if there is a delay in discharge due to tide lock.

It is our opinion that the Flood Risk Assessment does comply with the requirements of the NPPF along with its technical guidance and the requirements of Planning Practice Guidance. Therefore we would request that the Environment Agency reconsider their position and remove their objection and that the planning authority may move forward with the planning application and secure the relevant details via appropriate planning conditions.

Should you wish any further assistance in this matter, please don't hesitate to contact us.

Yours sincerely



Jamie Finch MCIHT
Monson Engineering Limited