

**From:** Nicola Oktay on behalf of Planning.Responses  
**Sent:** 18 June 2025 10:38  
**To:** Planning Scanning  
**Subject:** FW: Planning application ref LU/57/25/PD: 51 Pier Road, Littlehampton, BN17 5LP

Environment Agency response

**Nikki Oktay**  
**Planning Receptionist**, Planning Department

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**From:** Sophie Brown [REDACTED]  
**Sent:** 17 June 2025 16:10  
**To:** James Robinson (Guest) [REDACTED]  
**Cc:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>; [REDACTED]  
**Subject:** RE: Planning application ref LU/57/25/PD: 51 Pier Road, Littlehampton, BN17 5LP

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Hi James,

The Environment Agency will be maintaining our objection as we believe that the proposed development would result in an increase in vulnerability (Less Vulnerable to More Vulnerable according to the NPPF) and intensification of occupants at risk from a flooding event.

It is essential when providing evidence to demonstrate that the development can be made safe, particularly when a development relies upon safe access and egress and safe refuge, is designed to withstand the undefended flood level plus climate change allowances. As stated in the Flood Risk Assessment (dated 29/04/2025), in the undefended scenario, when taking future sea level rise into consideration, this site is at risk of flooding up to a level of 5.03 mAOD. This would result in a flood depth of up to 0.6m. Vulnerable ground floor residents who may potentially be asleep at the onset of a flooding event, will be most at risk from tidal inundation if this development were to be permitted.

We acknowledge that the Environment Agency did not object to a similar application in 2023, at a nearby address. However, National Planning Policy Guidance states that developments should mitigate against residual risk of defence failure or overtopping which means using the undefended scenario to define the design flood event. This is strengthened by the precedent set by recent planning appeals in the Arun District Council area regarding change of use including ground floor sleeping accommodation (i.e. LU/181/23/PL and BR/50/24/PL), we would also be likely to conclude that this development poses an unacceptable risk to life and/or property from flooding.

Kind regards

Sophie

**Sophie Brown**  
Planning Specialist, Sustainable Places Solent and South Downs  
**Environment Agency** | Oving Road, Chichester, West Sussex, PO20 2AG

[REDACTED]  
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To make this email more accessible for those with dyslexia, dyspraxia, dyscalculia and dysgraphia, I've changed my email font to Arial, 12pt with 0.5pt spacing.

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**From:** James Robinson [REDACTED]  
**Sent:** 11 June 2025 11:09  
**To:** Sophie Brown <[REDACTED]>  
**Cc:** [planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk); Tom Gibbs <[REDACTED]>; Jessica Bryan [REDACTED]  
**Subject:** Planning application ref LU/57/25/PD: 51 Pier Road, Littlehampton, BN17 5LP

You don't often get email from [jamesrobinson@geosmartinfo.co.uk](mailto:jamesrobinson@geosmartinfo.co.uk). [Learn why this is important](#)

Hi Sophie,

Hope you're well. Just to introduce myself, I'm James, the flood risk consultant appointed to assist with the planning application LU/57/25/PD: 51 Pier Road, Littlehampton, BN17 5LP.

I have been forwarded your latest consultation response dated 01/05/2025 (ref: HA/2025/126664/01) and have included the key comment below for ease of reference:

- *Notwithstanding the mitigation measures proposed, the risk to life and property from tidal inundation would be unacceptable if the development were to be permitted. - The application does not demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There is insufficient flood risk mitigation up to the design flood level and no specified arrangements for safe access and egress.*

In relation to the mitigation up to the design flood level, this does not appear to be accurate. For the location of the Site, the appropriate design flood level would be the 1 in 200 year tidal event including climate change, accounting for the presence of flood defences. According to EA data, this corresponds to 3.70 mAOD, while the proposed finished floor levels (FFLs) are set at 4.43 mAOD, sufficiently above the design level, and indicating no flood risk under the defended scenario.

While residual risk due to breach or failure of defences is acknowledged within the submitted FRA, it would not be reasonable to expect the developer to mitigate this given the typical low likelihood of occurrence and extreme depths.

I would like to draw your attention to planning application LU/139/23/PD at 56–57 Pier Road, which proposed a comparable scheme. In that case, the requirement to raise FFLs above the undefended flood level was not imposed; FFLs above the defended design level were deemed sufficient, despite the inclusion of ground floor sleeping accommodation.

It is my view that, where an area of safe refuge can be incorporated into the design at a first floor level then the design would be compliant with the national and local flood risk planning policy. Applying the undefended breach scenario to determine FFLs, with an added freeboard, doesn't align with standard policy interpretation in similar defended locations.

If there is a specific justification for applying the undefended scenario as the primary basis for this site, I would be grateful if you could provide further context, particularly given that the area is protected by maintained and effective flood defences.

Please let me know if you would prefer a meeting to discuss this in more detail.  
Kind regards,

James.



**James Robinson MCIWEM**  
Senior Consultant

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