

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

Our ref: HA/2012/112611/01-L01
Your ref: LU/5/12/
Date: 02 February 2012

Dear Ms Gardner

ERECTION OF 1 NO. 3 BED TOWN HOUSE

**R/O 27-29B SURREY STREET LITTLEHAMPTON
WEST SUSSEX
BN17 5BD**

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

Environment Agency position

The proposed development will only be acceptable if the following measure(s) as detailed in the Flood Risk Assessment (FRA) submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures detailed within the FRA:

1. *Finished habitable floor levels are set no lower than 4.60 m above Ordnance Datum (AOD).*
2. *A Flood Plan should be undertaken to the satisfaction of the local authority.*
3. *Flood resilient materials be incorporated within the construction of the ground floor of the proposed development.*

Environment Agency
Colvedene Court, Wessex Business Park, Wessex Way, Colden Common, Winchester, Hampshire, SO21 1WP.

Customer services line: 03708 506 506

www.environment-agency.gov.uk

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Reason

1. *To reduce the impact of flooding on the proposed development and future occupants.*
2. *To reduce the risk of flooding to the proposed development and future occupants.*
3. *To reduce the impact of flooding on the proposed development and future occupants*

Informative

The FRA submitted in support of this application shows that the building would be subject to internal, non habitable, flooding during the design event and that it is not possible for occupants of the proposed building to achieve the safe access and exit route recommended by Paragraph 8, PPS25 and Paragraph 4.60 of the PPS25 Practice Guide (December 2009).

In this instance the developer has opted for a safe refuge approach with habitable floor levels being set above the predicted flood level, excluding allowances for climate change. Reference is not made to the need for a Flood Plan within the FRA, however, we would recommend that one is undertaken to your authorities satisfaction or that the existing Flood Plan be amended to include this development.

The application site lies within Flood Zone 3 defined by PPS25 as having a high probability of flooding when including allowances for climate change over the lifetime of the development, and R&D report FD2320/TR2, Flood Risk Assessment Guidance for New Development, states that this represents a 'danger for most', although the duration of flooding will be limited to a couple of hours either side of the extreme tide peak. The anticipated maximum flood depth on the site is 1.70m during the 2115 flood event, which would result in an internal depth of approximately 0.5m.

However, it is acknowledged that flood risk can be managed in a number of ways. The LPA may decide that the height of the habitable floor levels and with safe refuge it may be appropriate to consider whether or not risk management measures that lie outside of our remit could be an acceptable means of enabling people to avoid flood hazards. This could include flood response planning and/or the incorporation of resistance and resilient construction.

In coming to a decision on the proposed development, the LPA should therefore give careful consideration to these issues, in consultation with relevant specialists such as their emergency planning department and Building Control, and request additional information from the applicant as appropriate.

If the LPA is not satisfied, taking into account all relevant considerations, that the proposed development can be considered safe without the provision of safe access and exit then planning permission should be refused.

In reviewing any site flood response plan, we recommend that the LPA consult their emergency planners, the emergency services and the Local Resilience Forum. It is essential that this consultation takes place prior to the granting of planning permission, as the agreement of a suitable flood response plan will be crucial to the safety of the development.

Please note that it is not within the normal remit of the Environment Agency to comment on or approve the adequacy of site flood plans and procedures accompanying development proposals, as we do not carry out these roles during a flood.

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users. PPS25, (Paragraph G12), and its associated Practice Guide (Paragraphs 7.25 to 7.33) place responsibilities on the LPAs to consult their Emergency Planners with regard to specific emergency planning issues relating to new development.

In all circumstances where warning and evacuation are significant measures in contributing to managing flood risk, we will expect LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

It should be noted that a suitable site specific flood plan may reduce the risk to the occupiers of the development, but would not remove it. Section 7.26 of the PPS25 Practice Guide states that new development should not rely on flood warning alone as the only way of managing residual risk. It should be noted that even if a flood warning is successfully issued by the Environment Agency, there can be no guarantee that occupants will receive or heed the warning.

Yours sincerely

AH Jackson
Development & Flood Risk
On behalf of Planning Liaison

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