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

Our ref: HA/2011/111813/02-L01
Your ref: LU/68/11/

Date: 01 August 2011

Dear Mr Smith

INTERNAL ALTERATIONS AND SINGLE STOREY REAR EXTENSIONS FORMING ADDITIONAL
FLAT 72 SOUTH TERRACE LITTLEHAMPTON

Environment Agency position
In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason
The FRA submitted with this application does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to:
1. Take the impacts of climate change into account
2. Consider the effect of a range of flooding events including extreme events on people and property
3. Demonstrate that the development will be safe for current and future occupants (Part C of the Exceptions Test in PPS25)

The application site is shown to be within flood zone 3, a high flood risk area in accordance with PPS25. In addition, the defences on the River Arun are not of a sufficiently high standard, offering only a 1 in 75 year standard of protection. The site is shown to flood during the design 1 in 200 year (0.5% probability) tidal event. Even taking the existing defences into account, our modelling shows a flood depth at this location of 0.59 metres. Using the figures provided in PPS25 to predict the effects of sea level rise, the predicted flood depth in 2115 would be 1.82 metres. This depth would be as a result of overtopping of the defences, and does not assume their failure or breach.

Even assuming there is no velocity, a safe evacuation route to and from the site (in

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accordance with table 13.1 of FD2320/TR2 Flood Risk Assessment Guidance for New Development) could not be provided based on these levels.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely

Miss Catherine McLeod
Planning Liaison Officer

Direct dial 01903 703858
Direct e-mail PlanningSSD@environment-agency.gov.uk

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