

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

Our ref: HA/2022/123884/01-L01
Your ref: P/178/21/OUT
Date: 01 February 2022

Dear Sir/Madam

**OUTLINE APPLICATION WITH ALL MATTERS RESERVED (EXCEPT ACCESS)
FOR THE CONSTRUCTION OF UP TO 106 NEW HOMES, FORMATION OF ACCESS
ONTO PAGHAM ROAD, NEW PEDESTRIAN AND CYCLE LINKS, THE LAYING OUT
OF OPEN SPACE, NEW STRATEGIC LANDSCAPING, HABITAT CREATION,
DRAINAGE FEATURES AND ASSOCIATED GROUND WORKS AND
INFRASTRUCTURE. LAND WEST OF PAGHAM ROAD PAGHAM**

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

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

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Correctly identify flood risk at the site Although according to our Flood Map for Planning (Rivers and the Sea) this proposal is mainly located in Flood Zone 1 (low risk), there is a small portion of tidal Flood Zone 2 (medium risk) and 3 (high risk) at the north-eastern side. According to our latest modelling the site could be affected when taking climate change into account and looking at the masterplan some of the proposed residential dwelling will be located within the climate change extent, without any mitigation measure being proposed.

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: [REDACTED]
www.gov.uk/environment-agency

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- Take the impacts of climate change into account There is no assessment of the impact of climate change using appropriate climate change allowances (guidance can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>)

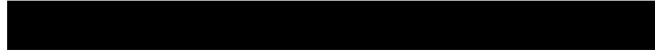
Overcoming our Objection

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'll respond within 21 days of receiving it.

FRA sources of information - advice to applicant

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email



Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

Flood risk data requests will be based on existing EA hydraulic models for existing 1% and 0.5% annual probability events with an allowance for climate change. Note as climate change allowances are updated we update our models but this work is not done immediately for all locations. You should refer to 'Flood risk assessments: climate change allowances' to check if the allowances modelled are appropriate for the type of development you are proposing and its location. You may need to undertake further assessment of future flood risk using different allowances to ensure your assessment of future flood risk is based on best available evidence.

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.

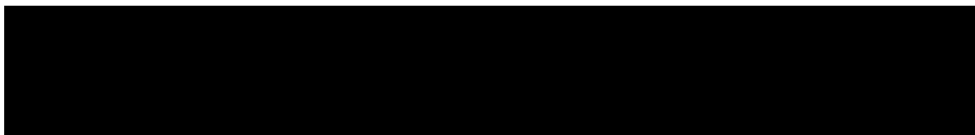
In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

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Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor



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