

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

Our ref: HA/2021/123285/01-L01
Your ref: WA/32/21/PL
Date: 28 June 2021

Dear Sir/Madam

**CONSTRUCTION OF 30 NO. DWELLINGS TOGETHER WITH ASSOCIATED ACCESS,
PARKING, PUBLIC OPEN SPACE & LANDSCAPING**

LAND AT WEST WALBERTON LANE, WALBERTON, BN18 0QF

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

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:

- Paragraph 3.6.5 of the supplied FRA refers to a modelled flood level to base the Finished Floor Levels on. There is no reference to which flood scenario this level is taken from or whether the correct design event was used. As such it is not possible to see if there has been a proper assessment of the impact of climate change using appropriate climate change allowances. Please provide details on the modelled water level used.
- The submitted FRA makes no mention of floodplain storage loss despite several drawings (including; drainage layout 1&2 and proposed site sections 220B) suggesting that there may be partial land raising for access roads and/or residential units. Compensation must be provided for any floodplain storage loss. Please provide post development ground levels and calculations for any compensation provided. There is a history of flooding downstream of the site on Barnham Lane and any floodplain storage loss is likely to increase the risk of flooding.

Environment Agency
Environment Agency Depot Canal Walk, Romsey, Hampshire, SO51 7LP.
Customer services line: [REDACTED]
www.gov.uk/environment-agency

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- Paragraph 4.3.3 of the supplied FRA mentions raising the banks of the attenuation pond in the flood zone to stop flood water entering the drainage network. The volume of floodplain storage lost to this pond must be given and compensation provided with calculations.

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.

Advice to Local Planning Authority/Applicant

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.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency 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.

Charged advice service

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

Miss Hannah Brothwell
Sustainable Places Advisor



cc Caroline Gould