

REP/006/001



Chris Banks <bankssolutionsuk@gmail.com>

Fwd: New Salts Farm

Message

Ben Daines <ben.daines@adur-worthing.gov.uk>
To: Chris Banks <bankssolutionsuk@gmail.com>

30 January 2017 at 16:35

Chris,

As per my last email, please see the email from the Environment Agency below.

Regards,

Ben Daines

Senior Planning Officer, Adur & Worthing Councils
Phone: 01273 263065
Email: ben.daines@adur-worthing.gov.uk
Website: <http://www.adur-worthing.gov.uk/planning-policy/>
Worthing Town Hall, Chapel Road, Worthing, West Sussex, BN11 1HA



----- Forwarded message -----

From: **Griggs, David** [REDACTED]
Date: 30 January 2017 at 15:15
Subject: RE: New Salts Farm
To: Ben Daines <ben.daines@adur-worthing.gov.uk>

Hi Ben,

I've responded directly to Boyer.

Our comments:

Flood Risk Assessment

The site is located within tidal Flood Zone 3 of our Flood Map. This indicates land with at least a 1 in 200 year risk of flooding from the sea. It is considered to be a high probability of flooding, in accordance with the national Planning Practice Guidance (PPG) (Ref ID: 7-065-20140306).

Paragraph 100 of the National Planning Policy Framework (NPPF) states that development in areas of flood risk should be made safe without increasing flood risk elsewhere. Paragraph 103 states that planning decisions should ensure that such development is appropriately flood resilient

and resistant.

The proposed finished floor level of 5.35m AOD is not sufficient to provide the proposed dwellings with appropriate resilience and would pose an unacceptable risk to occupants and property. It does not therefore provide adequate mitigation for the flood risks at the site.

The undefended 1 in 200 year tidal flood risk, including an allowance for climate change, is shown to be 5.391m AOD. To ensure that occupants are provided with suitable protection from flooding throughout the lifetime of the development, including access to safe refuge, floor levels to all habitable accommodation would need to be now lower than 5.421m AOD.

Although the Shoreham Adur Tidal Walls Scheme will offer significant improvements to the standard of protection of the wider area, development must be assessed on an undefended 1 in 200 year tidal flood risk, including an allowance for climate change. This is because there is a residual risk from the possibility that flood defences will not be maintained for the lifetime of the residential development and therefore offer the same standard of protection.

Surface water flood risk

The statutory responsibility for advising on surface water flood risk for this development is with West Sussex County Council, in their role as Lead Local Flood Authority.

We note however, that no details have been provided as to how downstream and upstream third parties might be affected by the developments impact on local sources of flooding, particularly at North Lancing. There is also no evidence as to how the drainage from the development would work in conjunction with a large scale residential development at New Monks Farm.

Proposed alterations to the ditch networks, and connecting flap valves and any works in, under, over or within 3-5m from the top of bank of the 'ordinary watercourses' at the site will require a Flood Defence Consent from Adur DC.

We recommend that you consult West Sussex County Council and Adur District Council with regards to surface water flood risk.

As far as we are concerned then, the main issue is whether appropriate mitigation can ensure that the residential dwellings are safe. Unless there are reasons to believe that the development cannot provide all habitable accommodation above the 1 in 200 year flood level, with an allowance for climate change and appropriate freeboard, (and I can't see at this stage that there are) then I don't anticipate we would have cause to find any allocation unsound (subject to the LPA's acceptance of that the Sequential Test and part one of the Exceptions Test have been met).

If you wish to discuss please don't hesitate to contact me.

Kind regards,

David

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