

Mrs Dinny Shaw  
Boyer Planning  
UK House (82) Heath Road  
Twickenham  
Middlesex  
TW1 4BW

**Our ref:** PAC/SLTSDN/00154

**DPS ref:** HA/2016/118295/01-L01

**Date:** 30 January 2017

Dear Mrs Shaw

## **Review of Flood Risk Assessment for erection of 455 dwellings**

### **New Salts Farm, Brighton Road, Lancing**

Thank you for accepting our offer to provide detailed planning advice. We have reviewed the Flood Risk Assessment (FRA) (Tully De'Ath ref. 11649 Issue 4, dated December 2016).

We are providing this advice under Agreement PAC/SLTSDN/00154. Please note we have taken 5 hours to review and provide our advice on these documents which is slightly less than we estimated in our Programme of Works The revised total will now be **£420** which is payable on receipt of our invoice.

### **Environment Agency Advice**

We have reviewed the submitted information in relation to the proposed development and have identified issues with the FRA that we suggest are addressed before the submission of any planning application.

We would likely **object** to any planning application for the proposed development, if supported by the submitted FRA.

We have the following detailed 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

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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, flood 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.

### **Flood protection measures**

We strongly recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.

Consultation with your Adur DC building control department is recommended when determining if flood proofing measures are effective.

We recommend reading the following guidance:

['Improving the flood resilience of new buildings'](#)

['Prepare your property for flooding: A guide for householders and small businesses'](#)

At any detailed planning stage, we note that buildings are to be constructed using flood resilient materials, but a flood plan would be required, and agreed with the local authority emergency planning officer

### **Flood emergency plan**

We recommend that a Flood Warning and Evacuation plan is developed for the site. This should be undertaken in consultation with the local planning authority and the local authority's emergency planners.

Please note that it is not our role to assess the detail of flood evacuation or emergency plans. 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 covered by our flood warning network.

I hope the above advice is helpful. If there is any further work you anticipate needing our detailed advice on in relation to this project please let me know so it can be incorporated into this charging agreement.

Yours sincerely

**Mr David Griggs**  
**Planning Advisor**

Direct dial 02030 259625

Direct e-mail [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk)

*Please note that the views expressed in this letter by the Environment Agency are a response to a pre-application enquiry only and do not represent our final view in relation to any future planning application made in relation to this site. We reserve the right to change our position in relation to any such application.*

*You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.*