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Planning Department
Worthing Town Hall
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Worthing
BN11 9SA

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Proposal: Installation of a multifunctional Communication Hub including defibrillator
Site: Pavement o/s 45-47 Montague Street, Worthing BN11 3BN

This Flood Risk Assessment (FRA) Statement has been prepared on behalf of Infocus Public Networks for the proposed installation of a multifunctional Communication Hub including a defibrillator located outside 45-47 Montague Street, Worthing within an area designated as Flood Risk Zone 3.

The purpose of this statement is to conduct a Sequential Test in accordance with national and local planning policy, to assess any potential flood risk associated with the proposed development, and to demonstrate that the design and siting of the unit will not give rise to an increased flood risk to the site or surrounding area and that the development can be made safe for its operational lifetime.

The proposed development comprises a telecommunications installation of limited scale and footprint. The development does not introduce vulnerable land uses, residential accommodation, or significant built form. Furthermore, the proposal does not result in any material alteration to existing ground levels, watercourses, flood storage capacity, or surface water flow paths.

The proposed development involves the installation of a free-standing unit. The unit will be positioned strategically to ensure minimal impact on the existing site and its surroundings, both physically and visually.

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Assessment of Flood Risk

National policy requires decision-makers to apply a sequential, risk-based approach to the location of development in areas at risk of flooding. The NPPF and Planning Practice Guidance recognise that some minor development and changes of use may not require the Sequential or Exception Tests where flood risk is not increased elsewhere and the development can be made safe. In this instance, and for robustness, a Sequential Test has been undertaken and a proportionate, site-specific assessment of flood risk is provided.

For the purposes of the Sequential Test, the proposed Communication Hub constitutes 'water-compatible' or at most 'less vulnerable' infrastructure, reflecting its limited physical footprint, non-habitable nature, and absence of any requirement for occupation during flood events.

1. Identification of Need and Functional Requirements

The primary purpose of the proposed unit is to provide public communication, wayfinding and emergency defibrillator provision within Worthing's town centre. The Hub must, by necessity, be located in a highly accessible public realm location where pedestrian footfall is concentrated and where 24-hour access is available for emergency equipment.

In this context, any realistic alternative site must:

- Be located within the established town centre pedestrian network;
- Provide immediate, step-free access from the public highway; and
- Allow for safe servicing and maintenance without impeding highway safety or emergency access.

2. Consideration of Alternative Sites in Lower Flood Risk Zones

The Sequential Test requires consideration of reasonably available alternative sites within areas of lower flood risk (i.e. Flood Zones 1 and 2), taking into account both planning and operational constraints.

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A review of the town centre public realm has been undertaken, considering:

- Existing pedestrianised streets, public squares and key movement corridors;
- Land on unregistered adopted highways where installation can reasonably be accommodated as statutory undertakers; and
- Locations that can host a free-standing unit without causing obstruction to footways, access to premises, or statutory undertakers' equipment.

This exercise identifies that the main town centre streets and public realm suitable for a unit of this type are predominantly within Flood Zone 3, with some adjacent streets falling within Flood Zone 2. In practice, there are very limited, if any, sequentially preferable locations within Flood Zone 1 that:

- Are of comparable accessibility and visibility for emergency equipment; and
- Can accommodate the required unit without conflicting with other critical infrastructure or causing highway or public safety concerns.

Within the overall town centre, the realistic options for siting the Hub are therefore constrained to areas within Flood Zones 2 and 3 that satisfy the functional criteria above.

3. Justification for the Application Site

Within this constrained town centre context, the application site on Montague Street is considered an appropriate and justified location for the following reasons:

Town Centre Function and Accessibility

The site sits on a key pedestrian thoroughfare within Worthing town centre, offering high public footfall and 24-hour accessibility to the defibrillator and communication functions. This level of accessibility cannot be replicated in more peripheral or lower-risk locations without undermining the primary public benefit of the proposal.

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Operational and Technical Constraints

The unit requires connection to existing electrical and communication networks and sufficient pavement width to avoid obstruction. The Montague Street location accommodates these requirements while maintaining safe pedestrian movement and servicing arrangements. Alternative sites either lack the necessary utility connections, have insufficient width, are occupied by existing street furniture, or would raise highway safety concerns.

Nature of Development and Flood Vulnerability

The Hub is a free-standing, non-habitable structure with no requirement for occupation during flood events. Its vulnerability to flooding is inherently low and its design has been tailored to withstand and safely manage potential floodwater interaction. In this context, siting the development within Flood Zone 3 is considered acceptable, provided that it does not increase flood risk elsewhere and remains safe for its intended use.

On the basis of the above, it is concluded that there are no reasonably available alternative sites in areas of lower flood risk (Zones 1 or 2) that could deliver the required town centre function, accessibility and technical connections. The Montague Street site therefore satisfies the Sequential Test as the most appropriate location, notwithstanding its Flood Zone 3 designation.

Assessment of Flood Risk: Pavement o/s 45-47 Montague Street, Worthing BN11 3BN

1. **Design and Siting:**

    - The proposed unit is designed with resilience in mind and will be constructed using materials that are resistant to flood damage.

    - The unit will be elevated on suitable supports where necessary to reduce any potential ground-level flooding interactions. As shown in *Appendix B – Hub Unit Detail*.

    - The application site has been positioned in an area that does not obstruct or alter existing drainage pathways, ensuring the natural flow of water is maintained.

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2. **Impact on Flood Risk:**

- The installation of the unit is not anticipated to exacerbate flood risk. Its design minimises obstruction of water flow, and its siting on reinforced supports prevents water displacement.

- There will be no substantial change in ground levels or increased impermeable surfaces that could affect local water drainage or increase flood risk.

3. **Mitigation Measures:**

- Regular inspections will be put in place to ensure there is no debris accumulation around the unit that could affect water drainage.

- Non-permanent anchoring allows for temporary removal during extreme weather events, if deemed necessary.

Each of the Hub units will be powered by an electrical supply from the Distribution Network Operator (DNO) for this Region. The supply feeds into a fuse head position 300mm off the ground within the base of the unit, please see attached plan that shows the fuse head location. The power connections are IP65 rated, which gives protection against water splashed or jets but not full immersion. Should that event occur then the RCB within the unit will trip and cut off the electrical supply.

A further protective measure is provided by the DNO in the event of the supply feed being fully immersed or compromised, by which the LST fuse will blow, resulting in a dead supply. The unit itself and internal connections are earthed to neutralize any residual current. The unit will therefore be completely safe and have no live connections in the case of the unit becoming fully immersed in water.

Conclusion

Having regard to the Sequential Test, the constrained town centre context and the compatible nature of the proposed development, the Montague Street site is considered an appropriate and justified location for the Communication Hub within Flood Zone 3.

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Given the non-intrusive character of the development, its classification as water-compatible / less vulnerable infrastructure and the measures incorporated to ensure safety in flood conditions, the proposed Communication Hub is considered acceptable in Flood Zone 3 in flood risk terms.

The assessment concludes that no additional flood risk management measures are required due to the non-intrusive nature of the proposed installation.

I trust the above provides the details and the insurance required, however please contact me if there are any further matters on which you need clarification.

Yours sincerely,



Stephen Herraghty MRTPI
Senior Town Planner
JCDecaux UK