SUPPLEMENTARY STAGE 1 FLOOD RISK ASSESSMENT.

FOR LAND ADJOINING

94 BRIGHTON ROAD, LANCING, WEST SUSSEX BN15 8LW

Application No. AWDM/1318/23



CLIENT

Jimmy Wallis (Edgeway Building Services Ltd)

C/o Brian Moore (Beecham Moore Partnership)

CONSULTING ENGINEER
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INDEX

1 INTRODUCTION

2 NEED FOR SEQUENTIAL TEST

3 SUMMARY

4 CONCLUSION

APPENDICES

APPENDIX 1 LETTER FROM THE SUSTAINABLE WATER MANAGEMENT OFFICER

APPENDIX 2 THE NEED FOR SEQUENTIAL TEST GUIDANCE

APPENDIX 3 EXTRACT FROM APPROVED APPLICATION AWDM/0372/19

Compiled by: Allen Rollings B.Sc. (Hons) C Eng MICE MCIHT

	DATE	COMPILED	CHECKED
Draft	July 8, 2021	AR	SR
1	July 29, 2021	AR	BM
Revised 1	October 14, 2021	AR	SR
Supplementary	December 15, 2023	AR	SR

1 INTRODUCTION

1.1 Jimmy Wallis (Edgeway Building Services Ltd) in conjunction with Brian Moore (Beecham Moore Partnership) commissioned Allen Rollings (the writer) to investigate the flood implications of a Planning Application for a new dwelling on the existing frontage to the A259 at 94 Brighton Road, Lancing BN15 8LW on the site of an existing garage and parking area. The original Flood Risk Assessment was submitted to Adur & Worthing District Council.

1.2 This report is required by the Sustainable Water Management Officer in connection with their need for a sequential test and exception test (**See Appendix 1**) and should be read in conjunction with the already submitted documents.

1.3 In the preparation of this report I have:

- Addressed the letter from the Sustainable Water Management Officer;
- Obtained information on the sequential test and the exception test;
- Referred to applications No. AWDM/0372/19 & App No AWDM/1921/17

1.4 This report has been prepared for Jimmy Wallis and Brian Moore and no responsibility is accepted to any third party for all or part of this report in connection with this or any other development.

2 NEED FOR SEQUENTIAL TEST

2.1 The sequential test contained in the Adur & Worthing Flood Risk Assessment is required as residential property in a Flood Zone 3 is defined as more vulnerable and therefore an exception test is required.

2.2 For the Exception Test to be passed, the proposed development must meet the following criteria:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk, as informed by a Strategic Flood Risk Assessment;
- a Flood Risk Assessment demonstrates that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

2.3 It has been demonstrated that the exception test has been passed for the properties in the area recommended for approval as demonstrated by the approval of similar developments such as for 2 semi-detached houses at 156 Brighton Road Lancing (App. No. AWDM/1921/17), along with Application No. AWDM/0372/19 for 6 No. dwellings.

2.4 Government Guidance shown in **Appendix 2** states that a sequential test is not required if one has already been carried out.

2.5 There has been extensive development along Brighton Road Lancing similar to this application and it has therefore been assumed that the District Council has carried out their own sequential tests or indeed at some point asked the developers to provide one.

2.6 It is also assumed that there has been approval of this type of development in Brighton Road in the Local Plan.

2.7 As the two above mentioned approvals and many more in the road have been obtained relying on the assumption that the need for a sequential test had been previously met. The Planning Authority already have access to it and this should now be readily available to the Sustainable Water Management Officer.

2.8 There has been long drawn out negotiations on this site in Brighton Road and the need for a sequential test or indeed an exception test has never been raised before until now.

2.9 In addition to the assumed sequential test having been passed additional information was supplied in the Approved Application No. No. AWDM/0372/19 (See **Appendix 3**).

3 SUMMARY

- the site is protected by sea defences which have been guaranteed for at least 100years to be maintained by the EA and therefore the likelihood of flooding is very low as predicted by the EA (**See Appendix 4 & 5 of the FRA**);
- the proposed property sits on top of an existing secondary flood defence mound and does not compromise it or indeed take up any further area of the flood plain;
- the proposed living accommodation is proposed to be constructed above the 0.1% probability of flooding and therefore has a very low risk of flooding;]
- the bedrooms are above the maximum flood level with a floor level of 7.2m AOD;
- the EA's map shows that it has a low risk of flooding from surface water;
- there is an escape route in close proximity available to the occupants of the property and an escape plan will be provided for this property;
- the recommendations contained in Section 8 of the original FRA report will give a high level of protection for the residents along with the properties.

4 CONCLUSION

4.1 It is contended that enough information has already been supplied to the Planning Authority in various FRA reports that shows that the sequential test and exception tests have already been met in accordance with the NPPF.

4.2 This application for 94 Brighton Road should now be considered on its merits.

4.3 It is therefore considered that the site is suitable for the construction of a new single attached semi-detached dwelling with a high degree of protection from flooding.

APPENDIX 1 THE LETTER FROM THE SUSTAINABLE WATER MANAGEMENT OFFICER

Peter Barnett
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

Date: 1st November 2023

Dear Peter Barnett,

RE: **AWDM/1318/23 – 94 Brighton Road, Lancing, West Sussex, BN15 8LW**

Thank you for your consultation on the above site. We have reviewed the application as submitted and wish to make the following comments.

The applicant is applying for permission to develop an attached three storey dwelling with same ridge height as no.94 plus 2no. parking spaces.

Following a review of the submitted information we would not recommend the approval of the application until a sequential test has been completed in compliance with NPPF, due to the proposed development being located in flood zone 3. Once this and the exception test have been submitted and passed, we will be able to provide comments regarding surface water drainage.

Yours sincerely,

Louise Tedridge
Sustainable Water Management Officer

APPENDIX 2 THE NEED FOR SEQUENTIAL TEST GUIDANCE

From: Environment Agency (/government/organisations/environment-agency) and Department for Environment, Food & Rural Affairs (/government/organisations/department-for-environment-food-rural-affairs)

Published 1 April 2012

Last updated 28 February 2017 —

Applies to England

Home > Environment > River maintenance, flooding and coastal erosion

Guidance

Flood risk assessment: the sequential test for applicants

Developments that need a sequential test

You need to do a sequential test if both of the following apply:

- your development is in flood zone 2 or 3 (http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-1-flood-zones/) - find out what flood zone you're in (https://flood-map-for-planning.service.gov.uk/)
- a sequential test hasn't already been done for a development of the type you plan to carry out on your proposed site - check with your local planning authority

APPENDIX 3 EXTRACT FROM APPROVED APPLICATION AWDM/0372/19

STAGE 1 FLOOD RISK ASSESSMENT.

LAND ADJOINING BEACH PARK,

BRIGHTON ROAD, LANCING, WEST SUSSEX BN15 8LW



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Beech Park

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This application was for 6No. dwellings to be constructed on the secondary flood protection mound similar to the application at 94 Brighton Road Lancing

9 NEED FOR SEQUENTIAL TEST

9.1 The sequential test contained in the RDC's Flood Risk Assessment is required as residential property in a Flood Zone 3 is defined as more vulnerable and therefore an exception test is required.

9.2 For the Exception Test to be passed, the proposed development must meet the following criteria:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk, as informed by a Strategic Flood Risk Assessment;
- a Flood Risk Assessment demonstrates that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

9.3 It has been demonstrated that the exception test has been passed for the properties in the area recommended for approval as demonstrated by the approval for 2 semi-detached houses at 156 Brighton Road Lancing App. No. AWDM/1921/17.

9.4 In summary,

- the site is protected by sea defences which have been guaranteed for at least 100years to be maintained by the EA and therefore the likelihood of flooding is very low as predicted by the EA (See **Appendix 6**);
- the proposed property sits on top of an existing secondary flood defence mound and does not compromise it or indeed take up any further area of the flood plain;
- the proposed living accommodation and bedrooms are proposed to be constructed above the highest predicted flood level in the unlikely event that flooding does take place;
- the EA's map shows that it has a low risk of flooding from surface water;
- there is an escape route in close proximity available to the occupants of the properties and an escape plan will be provided for each property;
- the recommendations contained in Section 8 of this report will give a high level of protection for the residents along with the properties.