Marie O'Keeffe
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

17 December 2024

Dear Marie,

RE: **AWDM/1356/24 – 102A Grand Avenue Lancing West Sussex BN15 9QD**

Thank you for your consultation on the above site. We have reviewed the application as the drainage consultant acting on behalf of the Council and wish to make the following comments.

The applicant is applying for a proposed detached annexe in rear garden. The application is to Adur District Council.

Following a review of the submitted information, **we have noted that insufficient information has been provided to demonstrate that the application is in accordance with the NPPF and PPG**. The following reasons prevent the approval of the application:

I. **Sequential Test** – The sequential test has not been applied. As stated in paragraph 172 of the NPPF, "*all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property*". Therefore, the sequential test should be applied to demonstrate there are no other suitable sites at a lower risk of flooding.
II. **Flood Depths** – Flood depths for the 1 in 1000-year storm have not been assessed. These should be assessed within the FRA as a proxy for climate change. These flood depths are up to 900mm, which is extremely dangerous and poses a threat to life.
III. **Safe Access and Egress** – As stated in paragraph 44 of the Planning Practice Guide (PPG) for flood risk and coastal change, '*if the probability of inundation is high, safe access and escape should be maintained for the lifetime of the development*'. Furthermore, paragraph 47 of the PPG states '*Wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen*

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hazards and contaminants in floodwater, or the risk that people remaining may require medical attention)'. Currently, safe access and egress has not been demonstrated.

IV. **Increase in Flood Risk** – Water displacement as a result of the development will increase flood risk to the site and elsewhere, which is not acceptable. The applicant is required to demonstrate that the proposed development will not increase flood risk to the site and elsewhere.

V. **Evacuation Plan** – Currently, it is recommended the applicant could adopt an emergency plan; however, these are not suitable for surface water flooding as it cannot be predicted through flood alerts and warnings.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 165-175 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Yours sincerely,

Sustainable Water Management Officer