creating a better place
for people and wildlife

Environment Agency

Adur & Worthing Councils
Planning team
Portland House
Richmond Road
Worthing
West Sussex
BN11 1LF

Our ref: HA/2022/124540/01-L01
Your ref: AWDM/0509/22

Date: 24 October 2022

Dear Planning team (FAO: Peter Barnett),

CHANGE OF USE OF OUTBUILDING TO A RESIDENTIAL ANNEXE.

95 GRINSTEAD LANE, LANCING, WEST SUSSEX BN15 9DT.

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

As this development poses an unacceptable risk to life from flooding, we **object** to this application and recommend that planning permission is refused.

Reasons

The site lies within Flood Zone 3, which is land defined by the Planning Practice Guidance as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life within the development from tidal inundation would be unacceptable if the development were to be permitted. The application does not demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There is insufficient flood risk mitigation up to the design flood level and/or no specified arrangements for safe access and egress.

Overcoming our objection

To overcome our objection, the Applicant should submit evidence to demonstrate that the proposal will not pose a risk to life as highlighted above. This could be achieved by ensuring sleeping accommodation is above the predicted 0.5% plus climate change level (2125). If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us on any revised FRA and we will respond within 21 days of receiving it.

Advice to the Local Planning Authority

Flood warning and emergency response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as 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. The Planning Practice Guidance (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

Advice to the Local Planning Authority and Applicant

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. In the meantime, if you would like to find out more about reducing flood damage, please visit the Flood Risk and Coastal Change pages of the Planning Practice Guidance (https://www.gov.uk/guidance/flood-risk-and-coastal-change).

Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

If you have any queries regarding the above information relating to this application ref: AWDM/0509/22, please do not hesitate to contact the advisor identified below.

Yours faithfully,

Environment Agency – Solent & South Downs

Sustainable Places Advisor: Anna Rabone
Direct dial: 02077 140525
Direct e-mail: anna.rabone@environment-agency.gov.uk

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