Mr Gary Peck
Adur & Worthing Councils
Development Control
Portland House
Richmond Road
Worthing
West Sussex
BN11 1LF

Our ref: HA/2017/119349/03-L01
Your ref: AWDM/0045/17

Date: 3 November 2017

Dear Mr Peck

Retention of change of use of building from single dwelling to two flats (retrospective)

158 Brighton Road, Lancing, West Sussex

Thank you for consulting the Environment Agency on the revised Flood Risk Assessment (FRA) (Ashfield ref. 85217-F01, dated September 2017) in support of the above planning application. We have the following comments to make.

Environment Agency Position

Until we receive confirmation from the local authority that they consider the Flood Warning and Evacuation Plan makes the development safe, we will **maintain our objection** to the proposed development.

Reasons
In our previous objection to the application (EA ref. HA/2017/119349/02-L01, dated July 2017) we raised issues with the safety of occupants of the ground floor flat, and the level of information on flood risk in the FRA.

The most recent FRA indicates that there will be flood depths of 2m above ground level in the 1 in 200 year tidal flood event, over the lifetime of the development (to the year 2115). The impacts of internal inundation to the ground floor flat in the design flood event would therefore pose a highly significant risk to people and property.

As such the safety of the development is reliant on the acceptability of the submitted Flood Warning and Evacuation Plan (FWEP) (Appendix C of the FRA).

We do not have access to any comments made by your emergency planners on the application. **We will maintain an objection based on the flood risks to the development, until you confirm in writing to us that the local authority consider**

the FWEP to be acceptable and capable of making the development appropriate in this location.

We do not normally comment on or approve the adequacy of flood emergency response and evacuation procedures accompanying development proposals, (including structural considerations where there is a reliance on refuge within buildings) 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.

The Planning Practice Guidance places responsibilities on LPAs to consult their emergency planners with regard to specific emergency planning issues relating to new development. In all circumstances where warning and evacuation are significant measures in contributing to managing flood risk, we will expect LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

We would recommend that the following issues need to be considered by the LPA, in consultation with relevant experts, when coming to a decision on this application:

1. Whether or not the principle of relying on flood response planning (prior warning and evacuation or refuge) is acceptable given the potential flood risk (depths) outlined above, then;

2. Whether or not the proposed refuge will enable people to remain safe, taking into account;

    a. The resilience and recoverability of essential services during and after a flood, and;
    b. The ability of the buildings to remain structurally stable during a flood

If the LPA is not satisfied, taking into account all relevant considerations and the submitted FWEP, that the proposed development can be considered safe then planning permission should be refused.

We will support the decision of the LPA on flood risk matters and should the LPA be minded to refuse the application on the grounds that the mitigation proposed is not considered satisfactory the EA would provide our full support at appeal.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely

Mr David Griggs
Planning Advisor

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cc Mr Christopher Webb

End