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

Our ref: HA/2013/114373/01-L01
Your ref: AWDM/0722/13

Date: 16 July 2013

Dear Mr Barnett

CHANGE OF USE OF REAR PART OF FIELD TO ENABLE ITS INCLUSION WITHIN CERTIFIED CAMPING AND CARAVAN PARK WITH ASSOCIATED INCREASE IN THE NUMBER OF CARAVAN PITCHES FROM 5 TO 25

THE BARN CARAVAN PARK OLD SALTS FARM ROAD LANCING WEST SUSSEX

Thank you for your consultation regarding the above. Please quote our reference number on any correspondence.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason: The 'Flood Risk Assessment Statement' in section 12.0 of the Design and Access Statement submitted with this application does not comply with the requirements set out in paragraph 9 of the Technical Guide to the National Planning Policy Framework (NPPF). The Flood Risk Assessment Statement does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the Flood Risk Assessment Statement fails to

- Consider how people will be kept safe from flood hazards identified
- Consider the requirement for flood emergency planning including flood
- Warning and evacuation of people for a range of flooding events up to and including the extreme event.

Table 2 of the Technical Guidance to NPPF states that sites used for holiday or short let

caravans and camping are only acceptable in flood zone 3 'subject to a specific warning and evacuation plan'. Therefore, this objection is because no emergency plan has been submitted with the application. The requirements of any emergency plan should be discussed with the Local Planning Authority (LPA).

This objection is necessary to ensure the development complies with the principles of the NPPF.

If the applicants or agents wish to discuss this position with us, they should contact me on the number below.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to LPA

The Environment Agency does 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.

Paragraph 9 of the Technical Guide to the NPPF states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPA’s to formally consider the emergency planning and rescue implications of new development in making their decisions.

I hope the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely

Helen Tier

Environment Agency
Sustainable Places East Team Planning Adviser

Direct dial 01903 703862
Direct e-mail PlanningSSD@environment-agency.gov.uk

cc James Breckell Architects

End