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

Our ref: HA/2016/117838/01-L01
Your ref: NOTICE/0029/15

Date: 27 January 2016

Dear Mr Barnett

PRIOR APPROVAL FOR CHANGE OF USE OF GROUND FLOOR SHOP (USE CLASS A1) TO 1NO. TWO-BEDROOM FLAT (USE CLASS C3) WITH ASSOCIATED EXTERNAL ALTERATIONS.

136 BEACH GREEN SHOREHAM-BY-SEA WEST SUSSEX BN43 5YA

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

Environment Agency position

In the absence of a Flood Risk Assessment (FRA), we **OBJECT** to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted.

Reason: The application site lies within Flood Zone 3 defined by the Environment Agency Flood Map for Planning as having a *high* probability of flooding. Paragraph 103, footnote 20 of the National Planning Policy Framework (NPPF) requires applicants for any planning permission to submit an FRA when development is proposed in such locations.

An FRA is vital if the Local Planning Authority (LPA) is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development is unknown. The absence of an FRA is therefore sufficient reason in itself for refusal of planning permission.

There is the potential for flood depths of over 2 meters therefore we would consider that sleeping accommodation on the ground floor with no access to the first floor may pose an unacceptable risk to occupants in accordance with Table 13.1 of FD2320/TR2.

We have reservations as to whether any FRA could address these issues satisfactorily, and the applicant should seriously consider this before engaging the services of a flood risk consultant.

We would recommend submitting a data request for modelled flood levels by contacting our Customers and Engagement team on: SSDEnquiries@environment-agency.gov.uk

We also recommend contacting the Environment Agency for advice but this will be subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit. Please use the email address below.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

I trust 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

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