Ms Eve Hearsey
Adur & Worthing Councils
Development Control
Portland House
Richmond Road
Worthing
West Sussex
BN11 1LF

**Our ref:** HA/2018/120068/01-L01
**Your ref:** AWDM/1947/17

**Date:** 23 January 2018

Dear Ms Hearsey

**Erection of new end-of-terrace dwelling attached to the south side elevation**
**10 Ormonde Way, Shoreham-by-Sea, West Sussex**

Thank you for consulting the Environment Agency on the above planning application. We have reviewed the submitted plans and relevant information and have the following comments to make.

## Environment Agency Position

We have **no objections** to the proposed development, **subject to the inclusion of the below condition** in any permission granted.

**Condition – Flood risk mitigation**
The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures detailed within the FRA:

- No habitable accommodation to be provided at ground floor.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

**Reasons**
The site is located within fluvial Flood Zone 3 of our Flood Map. This indicates land with a high probability (1 in 200 year) of flooding from the sea, in accordance with the national Planning Practice Guidance (PPG) (ref. 7-065-20140306).

Paragraphs 100 and 102 ('the Exceptions Test') of the National Planning Policy Framework (NPPF) require that development in areas of flood risk should be made safe without increasing flood risk elsewhere.

The national Planning Practice Guidance (PPG) states that development should be made safe by designing buildings to avoid flooding, e.g. by raising floor levels (Ref. 7-054-20150415).

The submitted floor plans to the proposed dwelling show that no habitable rooms will be located at ground floor.

The above mitigation measures are required in order to protect people and property from flooding, in accordance with the NPPF.

**Quality of FRAs**
We reiterate our previous comments that the quality of the submitted FRAs is not consistent with the requirements of the PPG, as explained in our previous responses (see EA responses HA/2017/119231/01-L01 & HA/2017/119231/02-L01). Our previous comments are completely supported by national planning policy and guidance.

These comments are on the basis of what is considered to be a reasonable and consistent approach, following the comments made by us on the previous applications at 7 and 10 Ormonde Way.

It does not reflect how we are likely to review FRAs on other sites, and if applicants are unsure whether their FRA constitutes an adequate assessment of their development we encourage them to contact us for pre-application advice.

**Safe access and egress**
In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

The PPG states that LPAs should consult their emergency planning staff to ensure evacuation plans are suitable through appropriate planning conditions (Ref. 7-054-20150415).

We therefore recommend seeking comments from the relevant emergency planners.

We note that the developments provide safe refuge at upper flood levels. Your emergency planners will be able to advise whether this needs to be part of a flood warning and evacuation plan secured by condition.

Please note that it is not our role to assess the detail of flood evacuation or emergency plans. 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.

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

Yours sincerely

**Mr David Griggs**
**Planning Advisor**

Direct dial 02030 259625
Direct e-mail PlanningSSD@environment-agency.gov.uk

End