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

Our ref: HA/2016/117838/02-L01
Your ref: NOTICE/0029/15

Date: 16 February 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

We have reviewed the Flood Risk Assessment (FRA) dated 29 January 2016 reference 56122/1 submitted to the Environment Agency on 4 February 2016.

Environment Agency position

In the absence of an acceptable FRA we **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reasons:

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 in accordance with the National Planning Policy Framework (NPPF).

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.

The FRA does not comply with the requirements set out in paragraph 9 of the Technical Guide to the NPPF. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to

1. Take the impacts of climate change into account

2. Consider how people will be kept safe from flood hazards identified

3. Consider the effect of a range of flooding events including extreme events on people and property.

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 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 02030257095
Direct e-mail PlanningSSD@environment-agency.gov.uk

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