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Environment Agency

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

Our ref: HA/2017/119158/01-L01
Your ref: AWDM/0164/17

Date: 21 March 2017

Dear Ms Cronin

Erection of dwelling at end of terrace

7 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 Flood Risk Assessment (FRA) and have the following comments.

Environment Agency Position

In the absence of an adequate Flood Risk Assessment, we **object** to the proposed development, as submitted.

Reasons
The site is located within tidal 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).

Paragraph 103 of the National Planning Policy Framework requires that development should only be considered appropriate in such locations is supported by a site specific FRA that demonstrates that is appropriately flood resilient and resistant and that any residual risks can be safely managed.

Even though the FRA mentions the presence of flood defences in the area, it must also address the residual risks of those defences failing or being overtopped to ensure the dwelling is made safe for its lifetime.

The PPG is clear that developments must be assessed and designed using the design flood level, which for tidal events is the 1 in 200 year flood level (Ref. 7-055-20140306), and also include an allowance for climate change.

The submitted FRA makes no reference to the 1 in 200 year flood level, or the impacts

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of climate change on the tidal flood risks at the site.

Although no habitable accommodation is shown at ground floor on the floor plans, and access to safe refuge at higher level is available, the FRA fails to specify the finished floor levels at first floor and assess them against the 1 in 200 year, plus climate change, level (5.4mAOD). We recommend that safe refuge and sleeping accommodation are 600mm are above this level to provide a suitable freeboard.

Overall the FRA does not comply with the requirements set out in the NPPF or PPG, and therefore does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

Overcoming our objection
The applicant can overcome our objection by submitting an FRA which addresses the deficiencies highlighted above and demonstrates that the development will be safe and appropriately flood resilient/ resistant.

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 recommend that the applicant reads the guidance in the PPG and on Gov.uk to ensure that any resubmitted FRA is adequate:

- PPG FRA Checklist
  http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/site-specific-flood-risk-assessment-checklist/

- DEFRA/ EA guidance on FRA for planning applications
  https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications

Safe access and egress
The FRA makes no mention of safe access and egress.

We recommend that you consult with your emergency planners or Fire and Rescue Service about whether safe access and egress, including a Flood Warning and Evacuation Plan, is vital to the development being considered appropriate in this location.

We do not 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.

Sequential Test Reminder
The local planning authority (LPA) must decide whether they are satisfied that the application demonstrates there are no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. This is required by paragraph 101 of the NPPF.

The FRA states that the scale of proposed development makes fulfilling the requirements of the Sequential Test impractical. Whether this is a sufficient reason not to undertake the Sequential Test is for the LPA to decide.

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Our Flood Risk Standing Advice reminds you of your responsibilities and provides advice on how to do this. Further advice is also accessible in the PPG (Ref. 7-033-20140306).

Final comments
Please consult us upon submission of any further information, including a revised FRA.

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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