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Environment Agency

Ms Marie O'Keeffe
Adur & Worthing Councils
Development Control
Portland House
Richmond Road
Worthing
West Sussex
BN11 1LF

Our ref: HA/2018/120067/01-L01
Your ref: AWDM/1841/17

Date: 23 January 2018

Dear Ms O'Keeffe

Demolition of existing detached dwelling and construction of two 4 bedroom semi detached dwellings over three and a half storeys

158 Brighton Road, Lancing, 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.

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) (RGP Design ref. D1003/FRA/1.1, dated July 2015) and the following mitigation measures detailed within the FRA:

- No habitable rooms 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 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).

The design flood level (1 in 200 year) including an allowance for climate change, is 5.4mAOD.

The FRA does not assess the impact of flooding in this event, or specify the level of habitable accommodation at first floor in mAOD. Based on the submitted section plans however, it would indicate that internal inundation of the first floor would be expected during the design flood event, in an undefended scenario.

However, we recognise that the existing building includes a self-contained ground floor flat with no internal safe refuge available above the design flood level.

The replacement dwellings will ensure both units have no habitable accommodation at ground floor (where the risk is greatest), and that both units have safe refuge available above the design flood level.

Therefore, despite the inadequacies of the FRA, we have no objections to the proposed development, subject to the above condition.

It is also noted that it is recommended that the occupiers sign up to the Environment Agency Flood Warning Service and have a flood evacuation plan.

On this basis we have no objection to the proposal, but we would recommend that the sleeping accommodation is moved from the first floor to the second floor, in line with the sequential approach required by paragraph 103 of the NPPF.

Flood warning and evacuation – Advice to LPA
Please note that it is not our role to assess any details on flood evacuation or emergency plans, 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.

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 (PPG Ref ID: 7-057-20140306).

We therefore recommend seeking comments from your Local Authority emergency planners.

Flood resilience and resistance
We recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.

We recommend reading the following guidance:

'Improving the flood resilience of new buildings'

'Prepare your property for flooding: A guide for householders and small businesses'

Consultation with the relevant building control department is recommended when determining if flood proofing measures are effective.

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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cc Mr Fred Randall

End