Mr Keith Morgan
Adur District Council
Development Control
Civic Centre Ham Road
Shoreham-by-Sea
West Sussex
BN43 6PR

**Our ref:** HA/2009/108182/01-L01
**Your ref:** ADC/0385/09

**Date:** 27 October 2009

Dear Mr Morgan

**PROPOSED 6-BEDROOM THREE STOREY SIDE EXTENSION AND SINGLE STOREY FRONT EXTENSION**

**68 - 70 BRIGHTON ROAD, LANCING, WEST SUSSEX**

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

**Environment Agency position**

In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal for the following reason:

**Reason**: The application site lies within Flood Zone 3 defined by Planning Policy Statement 25 – "Development and Flood Risk" (PPS25) as having a high probability of flooding. Paragraph E9 of PPS25 requires applicants for planning permission to submit an FRA when development is proposed in such locations.

In the absence of an acceptable FRA, the flood risks resulting from the proposed development are unknown. The absence of an acceptable FRA is therefore sufficient reason in itself for a refusal of planning permission. This reflects the precautionary approach to development in flood risk areas set out in paragraphs 10 and E9 of PPS25.

In accordance with PPS25, Policy NRM4 – "Sustainable Flood Risk Management" of the South East Plan and Policy AP3 of the Adopted Adur District Local Plan 1993-2006.

Notwithstanding the above objection, the proposal is also located on a secondary sea defence. Under Sea Defence Byelaws, any works whatsoever would require the prior

written consent of the Environment Agency. **This is unlikely to be forthcoming unless calculations are submitted demonstrating that the structural integrity of the defence will not be compromised by either the development or its construction.** . It is unclear from the submitted details whether it is proposed to cut into this defence. Therefore this also needs to be clarified as this may affect its structural integrity.

We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

If you are minded to grant the application contrary to our objection it will be necessary to re-consult us in accordance with guidance in PPS 25.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely

**HELEN TIER**
**Planning Liaison Officer (South Downs Area)**

Direct dial 01903 703862
Direct e-mail planning.southdowns@environment-agency.gov.uk

cc Atterbury Moore Associates

End