creating a better place
for people and wildlife

Environment Agency

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

Our ref: HA/2020/122825/01
Your ref: AWDM/2055/20

Date: 04 January 2021

Dear Sir or Madam,

PROPOSED ATTACHED THREE STOREY DWELLING WITH SAME RIDGE HEIGHT AS NO.94 PLUS 2NO. PARKING SPACES.

94 BRIGHTON ROAD, LANCING, WEST SUSSEX, BN15 8LW.

Thank you for the consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA), we **object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Planning Practice Guidance for Flood Risk and Coastal Change. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to take the impacts of climate change into account.

There is no assessment of the impact of climate change using the appropriate climate change allowances according to our guidance 'Flood risk assessments: climate change allowances'.

We would advise the Applicant to request our Product 4 data which gives outlines, levels and depths for a range of flood events. Also from December 2019, new climate change guidance has been published. The flood risk data provided as part of the Product 4 is based on the old guidance. The Applicant will need to undertake further assessment of future flood risk using the current guidance.

Although the FRA states that all the habitable rooms will be located at first floor, it fails to demonstrate that this is a sufficient mitigation measure when taking climate change into account. We would recommend that finished floor levels for habitable accommodations should be at least 300mm higher than the climate change levels.

In order to obtain the Product 4 data, the Applicant should email our Customers & Engagement team at SSDEnquiries@environment-agency.gov.uk. When sending the request, the Applicant should also include a plan identifying the site boundary. The data is provided free of charge. Requests are usually dealt with within 20 working days.

A checklist on what should be included in a flood risk assessment can also be found on the gov.uk website here –

https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section

Overcoming our objection

To overcome our objection, the Applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Advice to the Local Planning Authority

Our objection

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), 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.

Flood warning and emergency response

We do not normally 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.

The Planning Practice Guidance (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood, and to evacuate before an extreme flood, needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

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In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise Local Planning Authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.

Advice to the Local Planning Authority and Applicant

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your Building Control department. In the meantime, if you'd like to find out more about reducing flood damage, please visit the Planning Practice Guidance for Flood Risk and Coastal Change (https://www.gov.uk/guidance/flood-risk-and-coastal-change).

The following documents may also be useful:

Government guidance on flood resilient construction - https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience - https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx

British Standard 85500 – Flood resistant and resilient construction - https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Flood warning

The Applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit https://www.gov.uk/sign-up-for-flood-warnings. Our flood warning service is a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding.

To get help during a flood, visit https://www.gov.uk/help-during-flood.

For advice on what do after a flood, visit https://www.gov.uk/after-flood.

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Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully,

Miss Anna Rabone
Sustainable Places Advisor

Direct dial: 02077 140525
Direct e-mail: anna.rabone@environment-agency.gov.uk

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