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Environment Agency

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

Our ref: HA/2017/119106/01-L01
Your ref: AWDM/0097/17

Date: 3 March 2017

Dear Mr Barnett

Erection of 2 no. two-storey semi-detached properties and parking, following demolition of existing dwelling

83 Old Fort Road, Shoreham-by-Sea

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

We have **no objections** to the proposed development, as submitted.

Reasons
The site is partially located within tidal Flood Zone 3, according to our Flood Map. This indicates land with a high probability (1 in 200 year) of flooding from the sea.

The FRA submitted fails to comply with the requirements for FRAs in the national Planning Practice Guidance (PPG) (Ref. 7-030-20140306 and 7-068-20140306).

In particular, it fails to

- Provide information on the risks at the site (e.g. depths of flooding in the design flood event at the site, including of any internal flooding to the proposed dwellings)
- take into account the impacts of climate change
- provide evidence for the local planning authority to apply the Sequential and Exceptions Tests
- demonstrate what mitigation measures have been considered and how these will be implemented to ensure the development is safe
- demonstrate how the residual risks will be mitigated, e.g. resilience and resistance measures, flood warning and evacuation procedures.

However, whilst the proposals will result in an increase in households in an area of flood risk, the development will result in the replacement of an existing dwelling which is at

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more risk to flooding than the proposed dwellings, as it is a single storey dwelling with sleeping accommodation on the ground floor.

Therefore the proposed development will result in an overall improvement in terms of the safety to occupants and the flood resilience of the existing dwelling. Therefore we are not objecting to the proposals, despite the inadequacies of the FRA.

Flood resilience
We strongly 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 the developer reads the following guidance:

'Improving the flood resilience of new buildings'

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

We also recommend occupants sign up for our Flood Warning Information Service for the area. More information can be found here https://flood-warning-information.service.gov.uk/

Safe access and egress
In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities (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 (Ref. 7-054-20150415).

We therefore recommend seeking comments from the relevant emergency planners.

Please note that it is not our role to assess the detail of flood evacuation or emergency plans. 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.

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 James Breckell

End