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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/2016/118953/04-L01
Your ref: AWDM/1835/16

Date: 17 August 2017

Dear Mr Barnett

Retrospective application to convert existing ground floor commercial unit and storage area into 2no 1-bedroom flats

22 Old Shoreham Road, Shoreham-By-Sea, West Sussex

In our previous letter (EA ref. HA/2016/118953/03-L01, dated 27 July 2017) regarding further information submitted for the above planning application, we maintained our objection on the grounds of flood risk. We considered that the revised information still failed to adequately assess the flood risks to the development, or demonstrate the development to be safe.

We stated that our objection could be overcome if additional information on finished floor levels and expected depths, and confirmation that the Local Authority approve the flood warning and evacuation plan, could be provided.

The latter was provided in an email from yourself dated 11 August 2017, and we have the following comments to make.

Environment Agency Position

Based on the acceptance of the Local Authority of the flood warning and evacuation plan included in the submitted Flood Risk Assessment (FRA), we **remove our objection** to the proposed development.

Reasons

In our previous letters we have made clear that the site is at risk of tidal flooding, being

located in Flood Zone 3, and that the nature of the development (self-contained residential units at ground floor) poses significant risks to people and property from flooding.

We accept that raising floor levels to avoid internal inundation would be an unreasonable expectation, when considering that the proposed development is for the retrospective change of use of an existing building, and the significant flood depths expected. The FRA states that flood depths of 2.29m are expected at the site in the design flood event (1 in 200 year), including an allowance for climate change over the lifetime of the residential units.

Resilience measures such as those described at para 7.3 of the FRA are welcome. Paragraph 103 of the National Planning Policy Framework requires that such measures are implemented where necessary to make the development appropriately resilient. However, considering the above projected depths at the site, resilience measures alone would not be adequate to make the development safe and therefore appropriate in this location.

The safety of the development is therefore reliant on adequate flood emergency arrangements for occupants in a tidal flood event.

As previously stated, we are not the competent authority for assessing whether such plans are adequate as we do not carry out evacuation roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants.

Adur District Council have confirmed to us in writing that they consider the development to be safe in terms of flood warning and evacuation procedures. In the interests of transparency we recommend that this written confirmation is made public and available online.

We are concerned that the information we requested in our previous letter has not been submitted within a revised FRA, and that the above approval by Adur District Council appears to have been made without explicit information in the FRA on the likely internal flood depths to the ground floor.

However, given that the Local Authority's emergency planners are best placed to make judgment on flood emergency planning, and have confirmed they are satisfied based on the information submitted, we are able to remove our objection.

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 Rob Shepherd Designs

End