

Anita Gardner
Arun District Council
Development Control
1, Arun Civic Centre Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2014/115552/01-L01
Your ref: AB/130/13
Date: 24 April 2014

Dear Anita

**CHANGE OF USE AND EXTENSION TO CREATE 3NO. SELF CONTAINED APARTMENTS AND 1NO. MAISONETTE. THIS APPLICATION AFFECTS THE CHARACTER AND APPEARANCE OF ARUNDEL CONSERVATION AREA
ARDEN GUEST HOUSE 4 QUEENS LANE ARUNDEL BN18 9JN**

Thank you for consulting the Environment Agency on the above planning application which is located in Flood Zone 3 defined by the NPPF as having a high probability of flooding.

Environment Agency position

We have reviewed the submitted Flood Risk Assessment (FRA) which is the completed Flood Risk Standing Advice form for householder and other minor extensions. As stated on the form this should not be applied if an additional dwelling is being created.

Therefore as the proposal will result in additional residential dwellings, in the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reasons

Without an acceptable FRA we are unable to determine whether the proposed development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, in accordance with paragraph 103 of the National Planning Policy Framework (NPPF).

In accordance with paragraph 030 of the National Planning Practice Guidance a Flood Risk Assessment should demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users. The FRA submitted with this application does not comply with these requirements and does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to:

1. Consider the effect of a range of flooding events including extreme events on

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- people and property.
2. Consider the effects of climate change and how this affects the flood risk over the lifetime of the development
 3. Consider how people will be kept safe from flood hazards identified
 4. Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

Overcoming our objection

You can overcome our objection by submitting an FRA which complies with the requirements of the National Planning Policy Framework and National Planning Policy Guidance on flood risk and demonstrates that any residual risk can be safely managed and that development will not increase risk elsewhere. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We have concerns whether this can be achieved in relation to the proposed ground floor self contained apartment.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

If you have any queries or require further information please contact me.

Yours sincerely

Catherine Hutchins
Sustainable Places Planning Advisor
Environment Agency

