

3 Haydon Close, Bognor Regis PO21 4LG

Reference: 0191 - FRA- 002

Feb-21

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FLOOD RISK ASSESSMENT

Purpose of this report

- 1.1 RIDA Reports Ltd has been appointed by the owner of 3 Haydon Close to undertake a Level 1 Screening Flood Risk Assessment for a development located at PO21 4LG.

Objectives

- 1.2 The objectives of this FRA are to demonstrate the following:
- * Whether the proposed development is likely to be affected by current or future flooding.
 - * Whether the proposed development will increase flood risk elsewhere.
 - * Whether the flood risks associated with the proposed development can be satisfactorily managed.
 - * Whether the measures proposed to deal with the flood risk are sustainable.

Documents Consulted

- 1.3 To achieve these objectives the following documents have been consulted and/or referenced:

The National Planning Policy Framework (NPPF)
CIRIA C753 document The SuDS Manual, 2015
Local Flood Risk Management Strategy (LFRMS)
Level 1 Strategic Flood Risk Assessment (SFRA)
Aerial photographs and topographical survey of the site
British Geological Society Records
Environment Agency flood maps
The CIRIA publication 'C635 Designing for exceedance in urban drainage— Good practice'



Development Site and Location

- 2.1 The site is located at Haydon Close, Bognor Regis. The nearest post code is PO21 4LG. Refer to appendix A for site location plan.
- 2.2 The current use of the site is the garden of the dwelling. The current use vulnerability classification of the site is Water compatible. The site is located in the River Flood Zone 2. Refer to Appendix B for more details.

Development Proposals

- 2.3 The proposed development includes the extension of the current house to provide more internal space. . Refer to Appendix B for layout of the proposed development.
- 2.4 The vulnerability classification of the proposed development is More vulnerable with an estimated lifetime between 50 and 100 years.

Site Hydrology and Hydrogeology

- Surface Water 2.5 The local watercourse is approximately 60 m away from the development.
- Aquifer 2.6 The development is located within a secondary aquifer type A. Aquifers type A consist of permeable layers capable of supporting water supplies at a local rather than strategic scale. They are generally aquifers formerly classified as minor aquifers.
- Source Protection Zone 2.7 The site is not located within a Source Protection Zone.
- Ground Water Levels 2.8 The ground water levels for this site are unknown. However it is likely that the water table is low.

Site Geology

- Bedrock 2.9 The British Geological Society records of the site show that it is located within the London Clay.
- Superficial Deposits 2.10 The British Geological Society records show that the superficial deposits are Clay, Silt and Sand .
- Contaminated Land 2.11 The contaminated land register has not been consulted. The owner suggested that the site is not contaminated



National Planning Policy Framework (NPPF)

- 3.1 The NPPF and its technical guidance is a set of planning policies with the key objective to contribute to the achievement of sustainable development. As part of it, they ensure that flood risk and sustainability are taken into account during the planning process. This ensures that developments are not located in flood risk areas and directs developments to lower risk areas. The NPPF applies a sequential risk-based approach to determining the suitability of land for development in flood risk areas. The NPPF also encourages developers to seek opportunities to reduce the overall level of flood risk through the layout of the development and the application of Sustainable Drainage Systems (SuDS). Adoption of these principles at early stages of the project can ensure that the developments take into account appropriate mitigation which is included within the detailed design of the schemes.

The Flood and Water Management Act (2010)

- 3.2 The Flood and Water Management Act aims to reduce the flood risk associated with extreme weather events. It provides a robust management of flood risk for people, homes and businesses and also encourages the use of SuDS for developments. A robust SuDS strategy should take into account the recommendations given in this Flood Risk Assessment. The drainage strategy should incorporate SuDS within the design and also attenuate all flows to either the greenfield or brownfield run off and take into account the risk from other sources as necessary.

Level 1 Strategic Flood Risk Assessment (SFRA)

- 3.3 The SFRA Level 1 identifies flood risk constraints in the local Area. It gives procedures that should be followed in planning to tackle flood risk during any development.

Level 2 Strategic Flood Risk Assessment (SFRA)

- 3.4 The SFRA Level 2 provides more information on the area identified in the SFRA Level 1, in order to show whether the Exception Test can be passed.



- 4.1 The flood risks were determined by identifying the sources of flooding and assessing their possible impact and likelihood to the development.

Fluvial Flood Risk - Assessment

- 4.2 Fluvial flood risk was assessed using the Environment Agency Flood Zone Maps and the standing advice approach recommended in the NPPF guidelines. The standing advice takes into account the size of the development and the flood risk vulnerability of land uses.

Standing Advice Applicability

- Step 1** 4.3 The proposed development falls within the remit of the standing advice as it is a minor extension of a household with a floor space of no more than 250 square metres.
- Development Size

- Step 2** 4.4 The proposed development does not require a sequential test. The site is not in an area with increased flood risk as a result of multiple minor extensions.
- Sequential test

Fluvial Flood Risk - Flood Levels

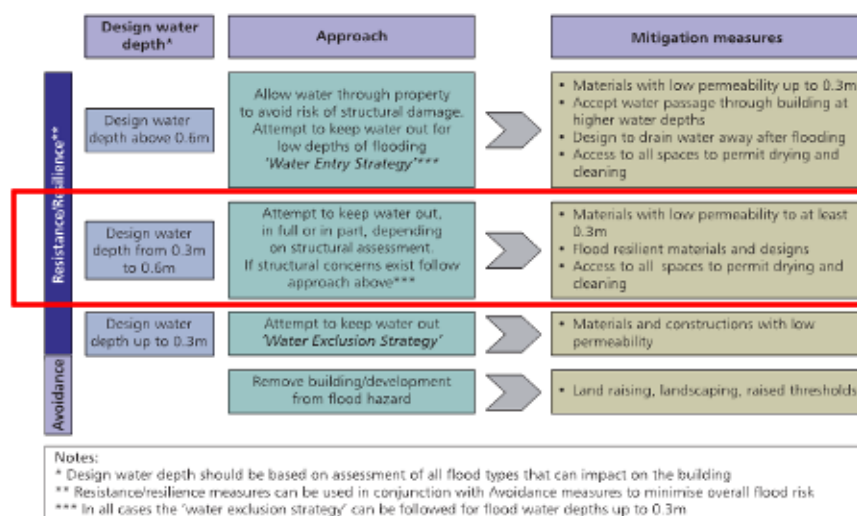
- 4.5 The site does not benefit from flood defences. The Environment Agency records show that the area around the site has not been flooded in the past.
- 4.6 The 1% AEP level for this site is unknown. The Climate Change allowances for the site is likely to be a central allowance of 500mm.

Fluvial Flood Risk - Resistance and Resilience Plan

- 4.7 The final floor level of the building has been set as per the existing building's ground levels. This level is no lower than existing levels and therefore the following flood proofing has been incorporated.
- 4.8 The flood resilience strategy for the development has been based on the CLG 2007 Improving the Flood Performance of New Buildings. See figure 1 below. The strategy is based on the water level within the proximity to the building.
- 4.9 Since the design water depth is unknown. It has been assumed that it is between 300mm and 600mm above the level of the ground level of the building. The water entry strategy approach has been used with a water exclusion strategy for up to 300mm depth flows.



Figure 1: Rationale for flood resilient and/or resistant design strategies.



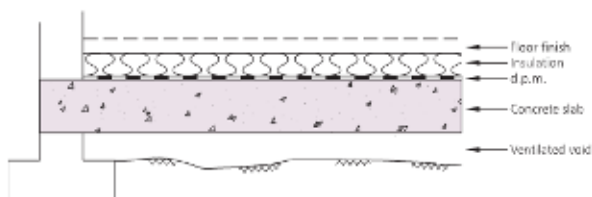
4.10 The building should utilise building materials that are suitable for a 'water exclusion strategy'. Materials classified as "Good" (highlighted in red) in Figure 2 shall be used for construction of the new building.

Figure 2: Flood resilience characteristics of building materials (based on laboratory testing)

Material	Resilience characteristics*		
	Water penetration	Drying ability	Retention of pre-flood dimensions, integrity
Bricks			
Engineering bricks (Classes A and B)	Good	Good	Good
Facing bricks (pressed)	Medium	Medium	Good
Facing bricks (handmade)	Poor	Poor	Poor
Blocks			
Concrete (3.5N, 7N)	Poor	Medium	Good
Aircrete	Medium	Poor	Good
Timber board			
OSB2, 11mm thick	Medium	Poor	Poor
OSB3, 18mm thick	Medium	Poor	Poor
Gypsum plasterboard			
Gypsum Plasterboard, 9mm thick	Poor	Not assessed	Poor
Mortars			
Below d.p.c. 1:3(cement:sand)	Good	Good	Good
Above d.p.c. 1:6(cement:sand)	Good	Good	Good

* Resilience characteristics are related to the testing carried out and exclude aspects such as ability to withstand freeze/thaw cycles, cleanliness and mould growth

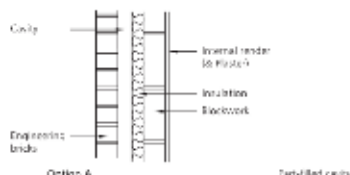
4.11 Foundations: Suspended concrete floor slabs at least 150mm thick is the preferred option. There should be a minimum space of 150mm ventilated void between the ground level and the bottom of the floor slab. Damp proof membranes should be included in the design. Floor insulation should be of the closed-cell type. Under floor services using ferrous materials should be avoided. Ceramic/concrete-based floor tiles, sitting on a bed of sand, cement render and water resistant grout can be used. See typical detail below:



- Reinforced concrete slab at least 150mm thick and complying with structural requirements for uplift forces
- Damp proof membrane of polythene at least 1200 gauge
- Insulation as rigid closed-cell material
- Ceramic tiles or stone floor finishes and including skirting boards.

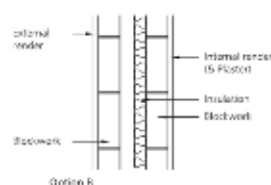
4.12 Concrete blocks used in foundations should be sealed with an impermeable material or encased in concrete to prevent water movement from the ground to the wall construction.

4.13 External Walls: Good quality facing bricks can be used for external face. External renders should not be used. External insulation is better than cavity insulation. See typical options below.



Part-filled cavity – Option A

- External face consisting of engineering bricks up to required level, for flood protection (up to 0.6m maximum above floor level plus one course). Other external facing materials can be used above this level, but ensure into face is watertight.
- Rigid insulation.
- Internal face consisting of blocks.
- Internal cement based render, preferably with lime content. Composition depends on masonry; the following mix is effective:
 - 1 cement : 4 sand : 1 lime on stone.
- Ensure stainless steel nail ties are used to minimise corrosion and consequent staining.
- Sacrificial plasterboard can be used, but it needs to be removed between ground floor and flood level. The board should be fixed horizontally to make removal easier. In some cases a dado rail can be used to cover the joint.



Part-filled cavity – Option B

- External cement based render, preferably with lime content. Composition depends on masonry; the following mixes are effective:
 - 1 cement : 4 sand : 1 lime on concrete blockwork
 - 1 cement : 4 sand : 1 lime on stone.
- External face consisting of blocks.
- Rigid insulation.
- Internal face consisting of blocks.
- Internal cement based render, preferably with lime content. Composition depends on masonry; the following mix is effective for flood resistance:
 - 1 cement : 4 sand : 1 lime on stone.
- Ensure stainless steel nail ties are used to minimise corrosion and consequent staining.

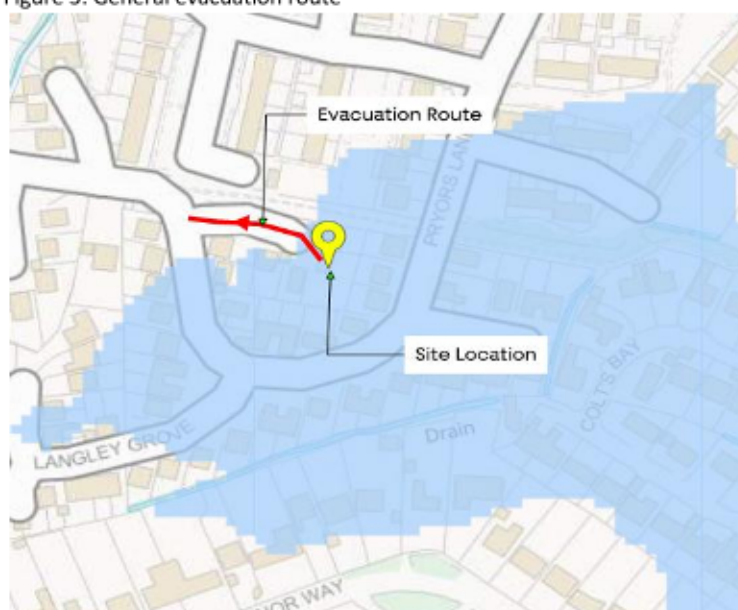
4.14 Services and fittings (communications wiring, hearing systems, electrical services, water, electricity and gas meters) should be placed at above the flood level. Where possible, all service entries should be sealed (e.g. with expanding foam or similar closed cell material). Closed cell insulation should be used for pipes which are below the predicted flood level.

- 4.15 Fittings should be designed to be replaced after a flood, it is advisable to specify durable fittings that are not appreciably affected by water and can be easily cleaned (e.g. use of plastic materials or stainless steel). The cost of these units may need to be balanced against the predicted frequency of flooding. Avoid wood fibre based carcasses and use easily removable solid wood doors and drawers.

Fluvial Flood Risk - Access and Evacuation

- 4.16 Safe egress is achievable by following Haydon Close towards Langley Road, which is shown to be beyond the extent of flooding. See figure 3 below for details.
- 4.17 The site is within an Environment Agency Flood Warning Area. The occupants of the site are encouraged to sign up to the alerts and should use these to form an appropriate Flood Management and Evacuation Plan prior to occupation of the site.

Figure 3: General evacuation route



Fluvial Flood Risk - Surface Water Management

- 4.18 The surface water run-off will be disposed using SuDS techniques. The aim is to provide a sustainable design that accommodates the proposed attenuation volume and replicated the existing drainage regime using the SuDS hierarchy is shown in the figure 4 below.

- 4.19 The SuDS techniques highlighted in red below can be used on site. This assessment is based on the ground conditions and the potential discharge points available.

Figure 4: The SuDS Hierarchy (Source:EA Thames region, SuDS a practical guide)

Most Sustainable	SUDS technique	Flood Reduction	Pollution Reduction	Landscape & Wildlife Benefit
↑	Living roofs	✓	✓	✓
	Basins and ponds - Constructed wetlands - Balancing ponds - Detention basins - Retention ponds	✓	✓	✓
	Filter strips and swales	✓	✓	✓
	Infiltration devices - soakaways - infiltration trenches and basins	✓	✓	✓
	Permeable surfaces and filter drains - gravelled areas - solid paving blocks - porous paviers	✓	✓	
↓	Tanked systems - over-sized pipes/tanks - storm cells	✓		
	Least Sustainable			

- 4.20 These SuDS techniques should be implemented and sized during the detailed design of the project

Fluvial Flood Risk - Working next to a main river

- 4.21 The development is more than 8 metres of the bank of a main river, or 16 metres if it is a tidal main river. A Flood risk activity Environmental Permit is not required.

Surface water (overland flows) flood risk

- 4.22 The basis of the surface water flood maps is defined by the Environment Agency as follows.

"The nationally produced surface water flood mapping only indicates where surface water flooding could occur as a result of local rainfall

- Ordinary watercourses
- Drainage systems or public sewers caused by catchment-wide rainfall events
- Rivers
- Groundwater.

Due to the modelling techniques used, the mapping picks out depressions in the ground surface and simulates some flow along natural drainage channels, rivers, low areas in floodplains, and flow paths between buildings. Although the maps appear to show flooding from ordinary watercourses, they should not be taken as definitive mapping of flood risk from these as the conveyance effect of ordinary watercourses or drainage channels is not explicitly modelled. Also, structures (such as bridges, culverts and weirs) and flood risk management infrastructure (such as defences) are not represented.

The nationally produced surface water flood mapping does not take account of the effect of pumping stations in catchments with pumped drainage. No allowance is made for tide locking, high tidal or fluvial levels where sewers cannot discharge in to rivers or the sea."

- 4.23 The Environment Agency maps show that the flood risk from surface water is very low. A residual risk of localised ponding remains unlikely.

Flooding from drainage systems in adjacent areas

- 4.24 There are no records of sewer flooding within the site.
- 4.25 The site is outside of a critical drainage area. No mitigation required.

Reservoirs Risks

- 4.26 The Reservoir Flood Map (RFM) produced by the Environment Agency do not show the risk to individual properties of dam breach flooding. The maps do not indicate or relate to any particular probability of dam breach flooding. The maps were prepared for emergency planning purposes and can be used to help reservoir owners produce on-site plans and the Local Resilience Forum produce off-site plans, and to prioritise areas for evacuation/early warning in the event of a potential dam failure. The RFM shows that the development could be within the possible dam breach flooding path. It is recommended that the Local Resilience Forum is contacted during detailed design. See Appendix C.

Groundwater flood risk

- 4.27 The Strategic Flood risk assessment shows that the site has limited ground water flooding. No mitigation is required.



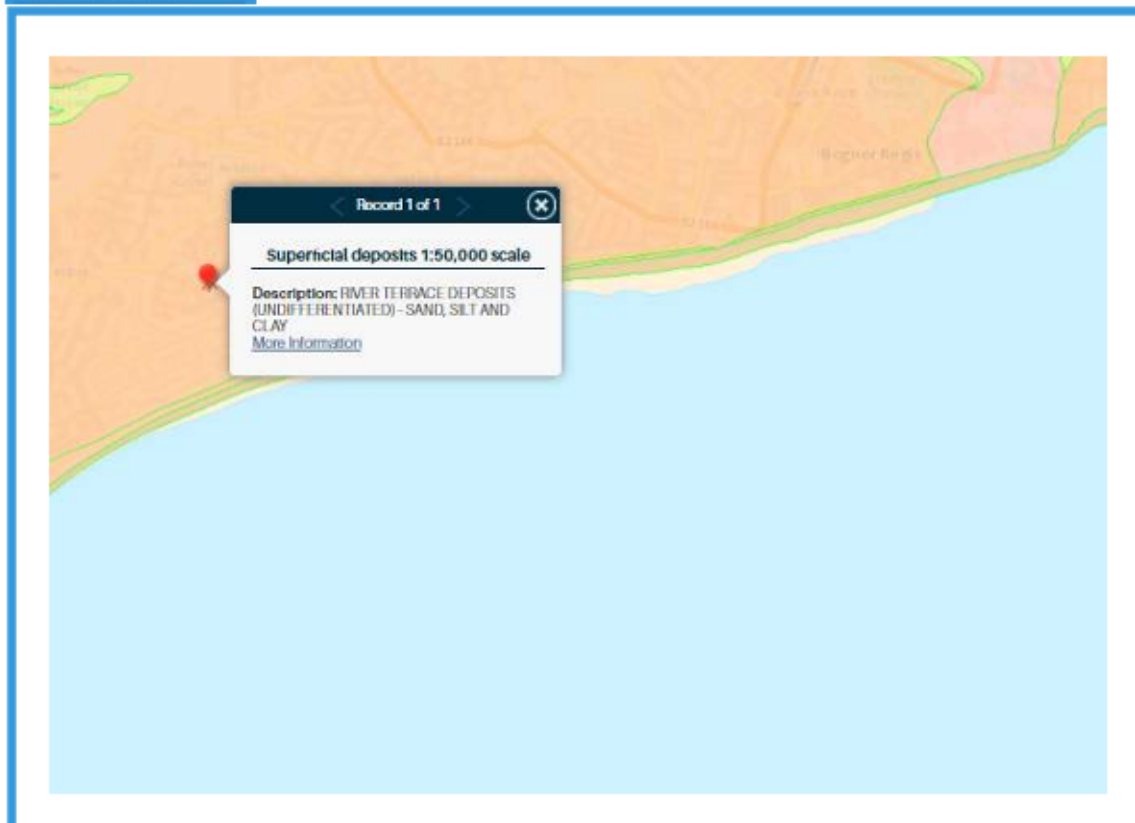
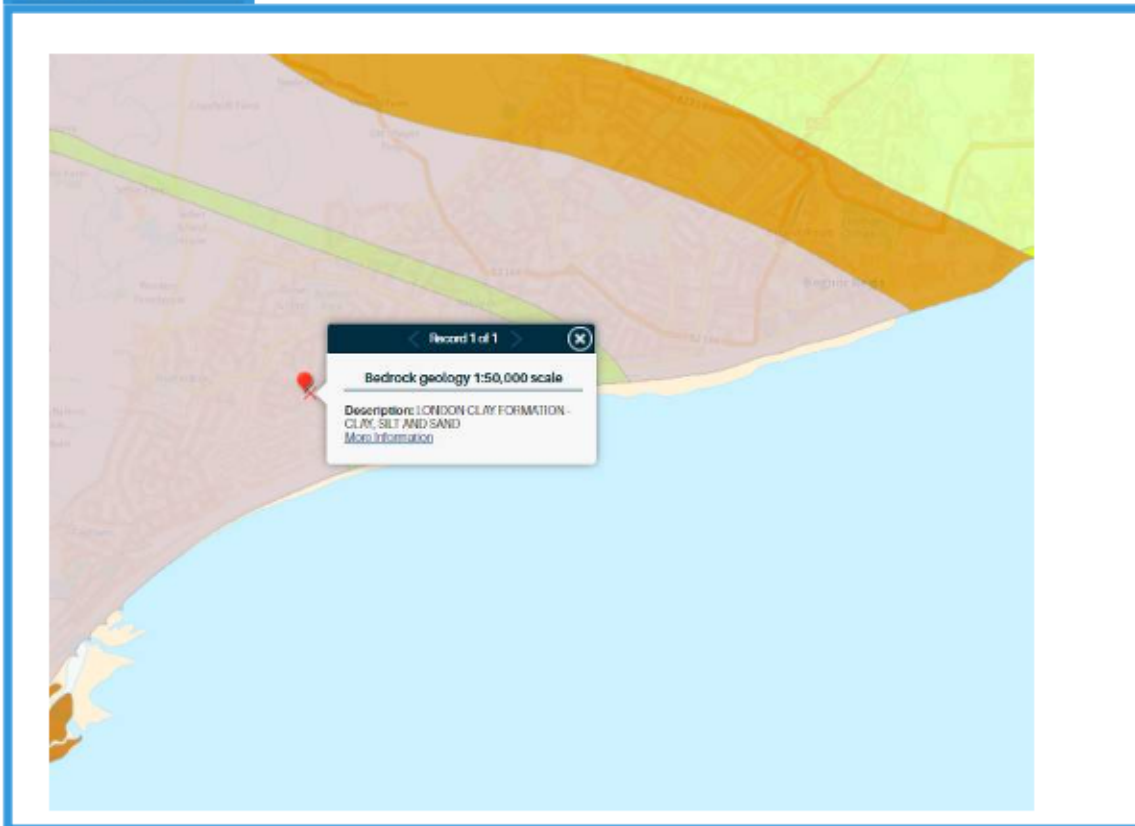
- 5.1 The development fully complies with the NPPF as it has been designed for water entry and be safe for use. The drainage principles should be used in the detailed design of the surface water systems.
- 5.2 This report demonstrates that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere.



Appendix A

Appendix B

Appendix C





Main River Map



SITE FLOOD RISK

Low risk means that each year this area has a chance of flooding of between 0.1% and 1%. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

Flood risk from surface water

Extent of flooding



Flood risk



High



Medium



Low



Very low

Flood risk from reservoirs

Extent of flooding



Flood risk



Maximum extent of flooding

Flood map for planning

Your reference
3 Haydon Clo

Location (easting/northing)
490255/98419

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4 Feb 2021 23:27

Your selected location is in flood zone 2, an area with a medium probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

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Flood map for planning

Your reference

3 Haydon Clo

Location (easting/northing)

490255/98419

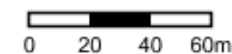
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-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Householder and other minor extensions in Flood Zone 2 and 3

This guidance is for domestic extensions and non-domestic extensions where the additional footprint created by the development does not exceed 250sq. metres. It should NOT be applied if an additional dwelling is being created, e.g. a self contained annex. In this instance consult the Environment Agency.

We recommend that:

Planning Authorities:

- 1) Refer the applicant to the standing advice pages on the Environment Agency website or provide them with a copy of this page for them to include as part of the planning application submission.
- 2) Check the planning application to ensure that one or other of the mitigation measures from the table below has been incorporated.

Applicants:

Complete the table below and include it with the planning application submission. The table, together with the supporting evidence, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority (LPA) that flood risk issues have been adequately addressed.

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'.
Either; Floor levels within the proposed development will be set no lower than existing levels AND, flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques, to be included in accordance with ' <i>Improving the flood performance of new buildings</i> ' CLG (2007)	Yes
OR; Floor levels within the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum ¹	N/A

Subterranean/basement extensions

Due to the risk of rapid inundation by floodwater basements should be avoided in areas at risk of flooding. The LPA may hold additional guidance for basement extensions.

Self-contained basement dwellings are 'highly vulnerable' development and should not be permitted in Flood Zone 3. We are opposed to these developments.

¹ Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour lines on Ordnance Survey maps measure heights above OD for example, though these are not accurate enough for flood risk assessment.

Cumulative impact of minor extensions and the removal of Permitted Development rights.

There is potential for cumulative impact of minor extensions to have a significant effect on flood risk. Where local knowledge (Strategic Flood Risk Assessment held by the LPA/information provided by the parish council) suggests this is the case the guidance contained in FRA guidance note 2 should be applied. FRA guidance note 2 can also be applied where permitted development rights have been removed for flood risk reasons. The Environment Agency does not usually comment on minor development in this category.

Permeable paving and changes to permitted development rights for householders

On the 1st October 2008 the General Permitted Development Order (GPDO) in England was amended by the Government (Statutory Instrument 2008 No. 2362).

One of the changes introduced by the GPDO amendment is the removal of permitted development rights for householders wishing to install hard surfacing in front gardens which exceeds 5sq. metres (i.e. 1m x 5m) without making provision to ensure permeability. This means that use of traditional materials, such as impermeable concrete, where there is no facility in place to ensure permeability, requires an application for planning permission.

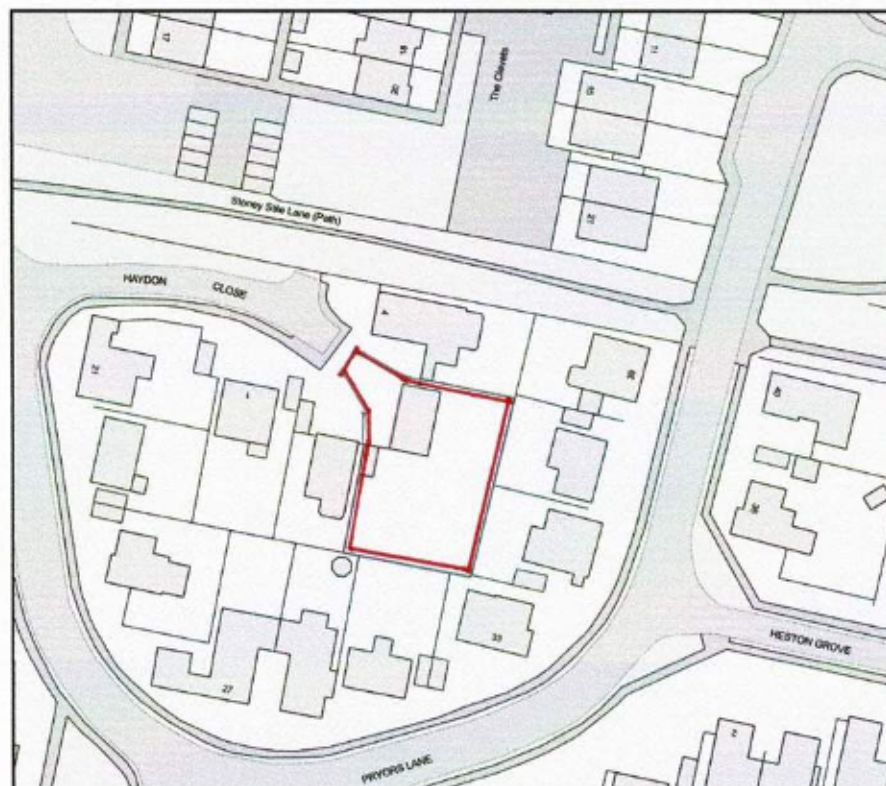
In order to help and advise householders of the options for achieving permeability and meeting the condition for permitted development status the Department for Communities and Local Government (CLG) has produced guidance on permeable paving which can be found on the following link <https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance>

The Environment Agency supports the GPDO amendment as it is in line with the recommendation of the Pitt Report regarding the need to better tackle the impact of surface water flooding. However, Local Planning Authorities should determine these applications in accordance with the CLG guidance **without** consulting the Environment Agency.

End of comment

Appendix A

LOCATION PLAN 3 HAYDON CLOSE BOGNOR REGIS



0 50
Metres



Plan Produced for: MRS VITANYI

Date Produced: 20 Jan 2021

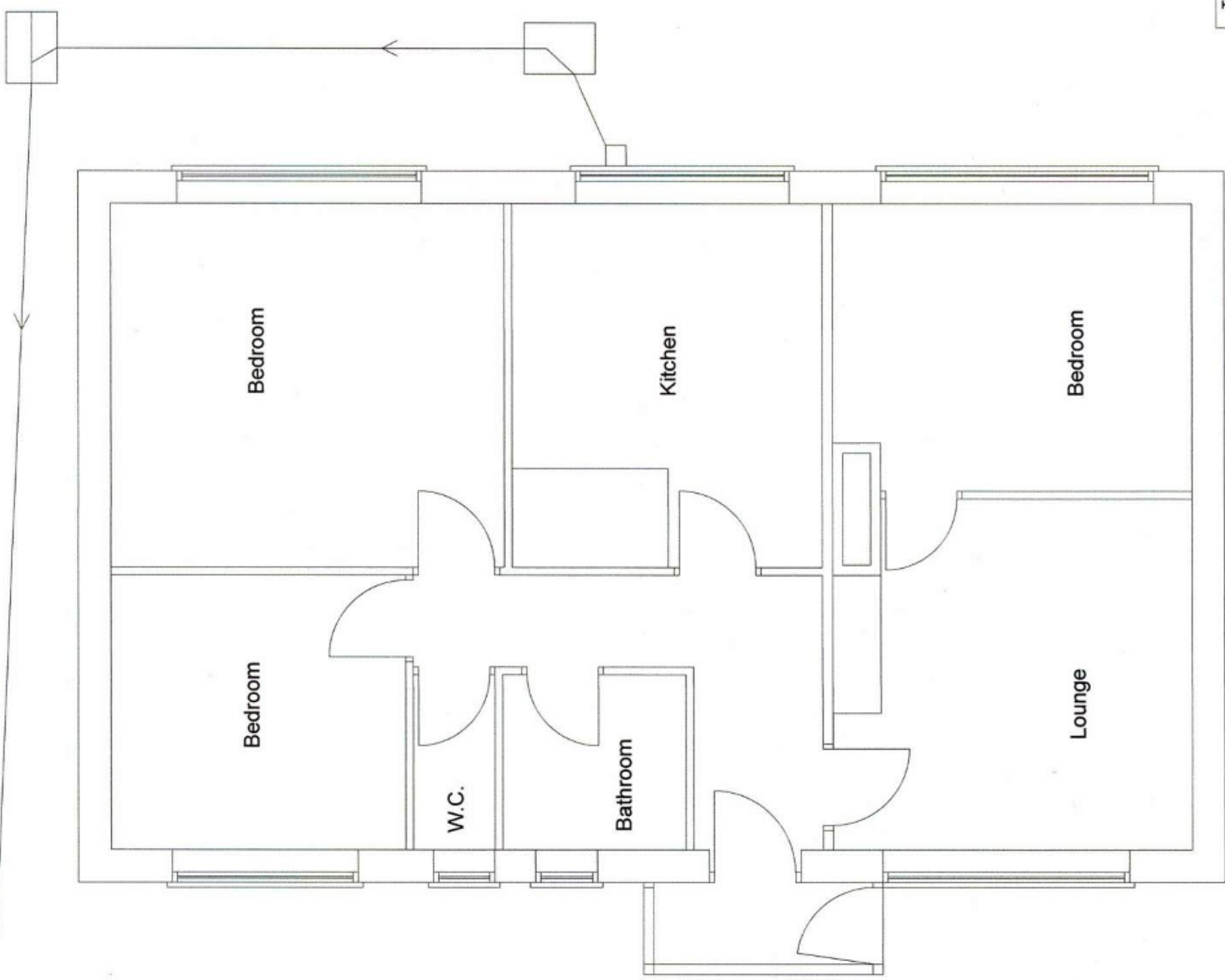
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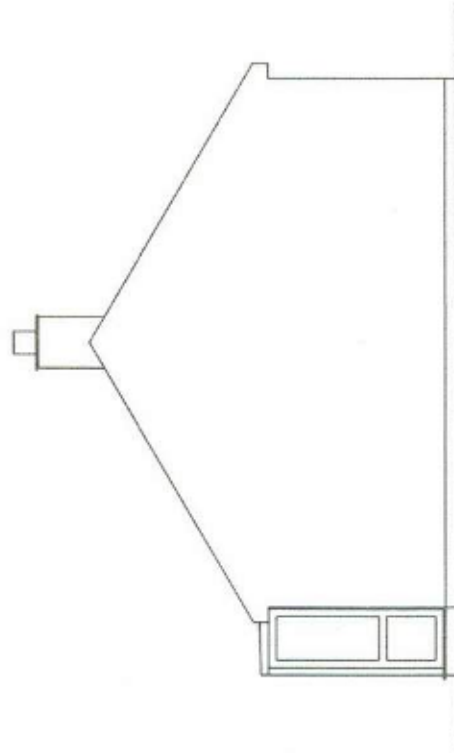
Appendix B



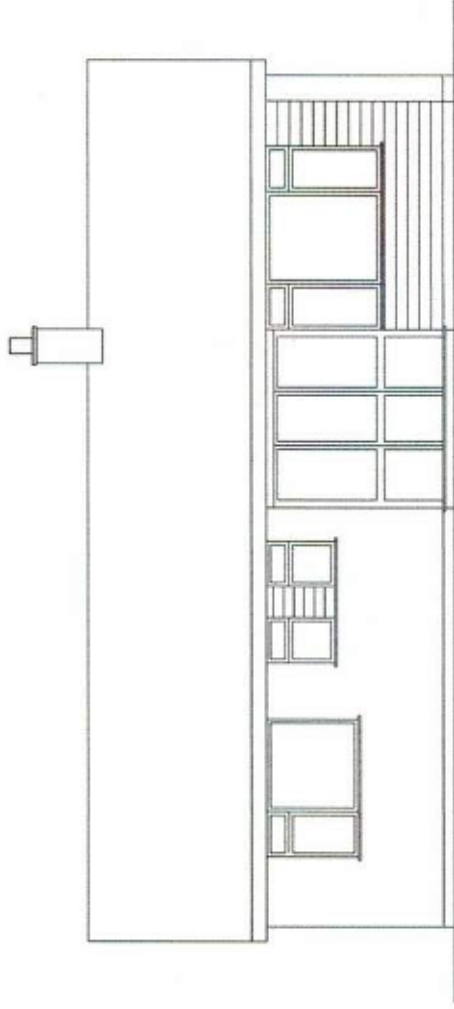
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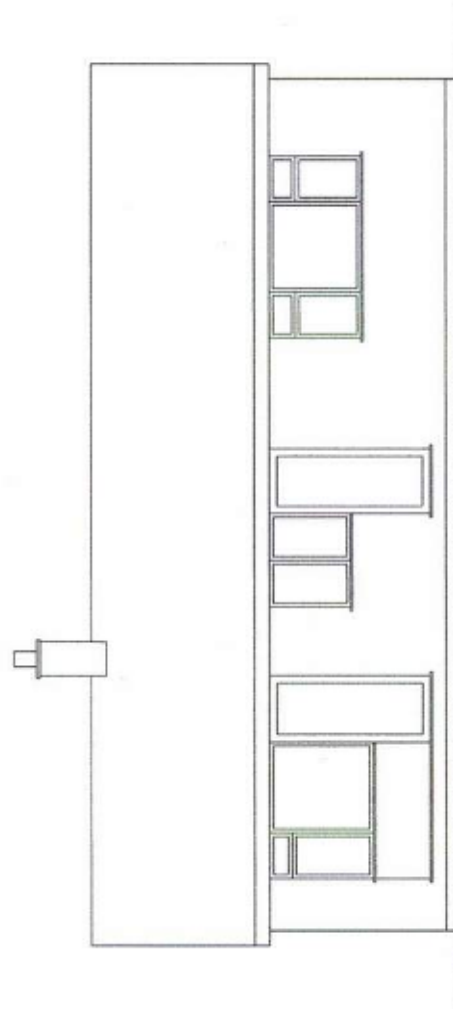
Mr. & Mrs. Vitanyi
3 Haydon Close, Bognor Regis
West Sussex PO21 4LG
EXISTING FLOORPLANS
Date: JAN 2021 Scale 1:50 Dw no. EX.FP. 01



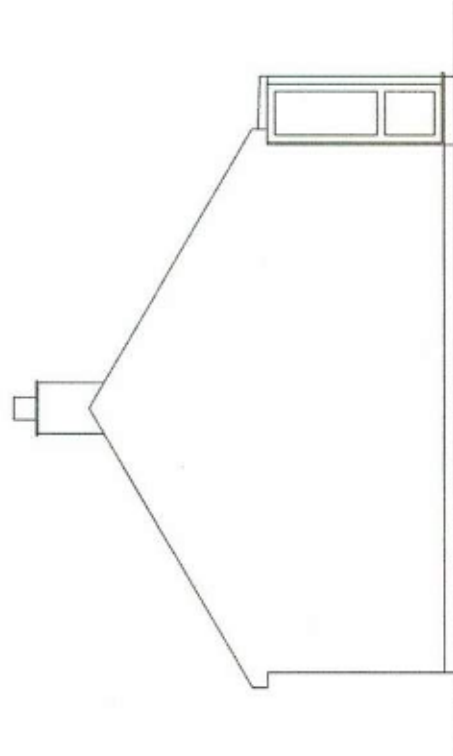
SOUTH



WEST



EAST



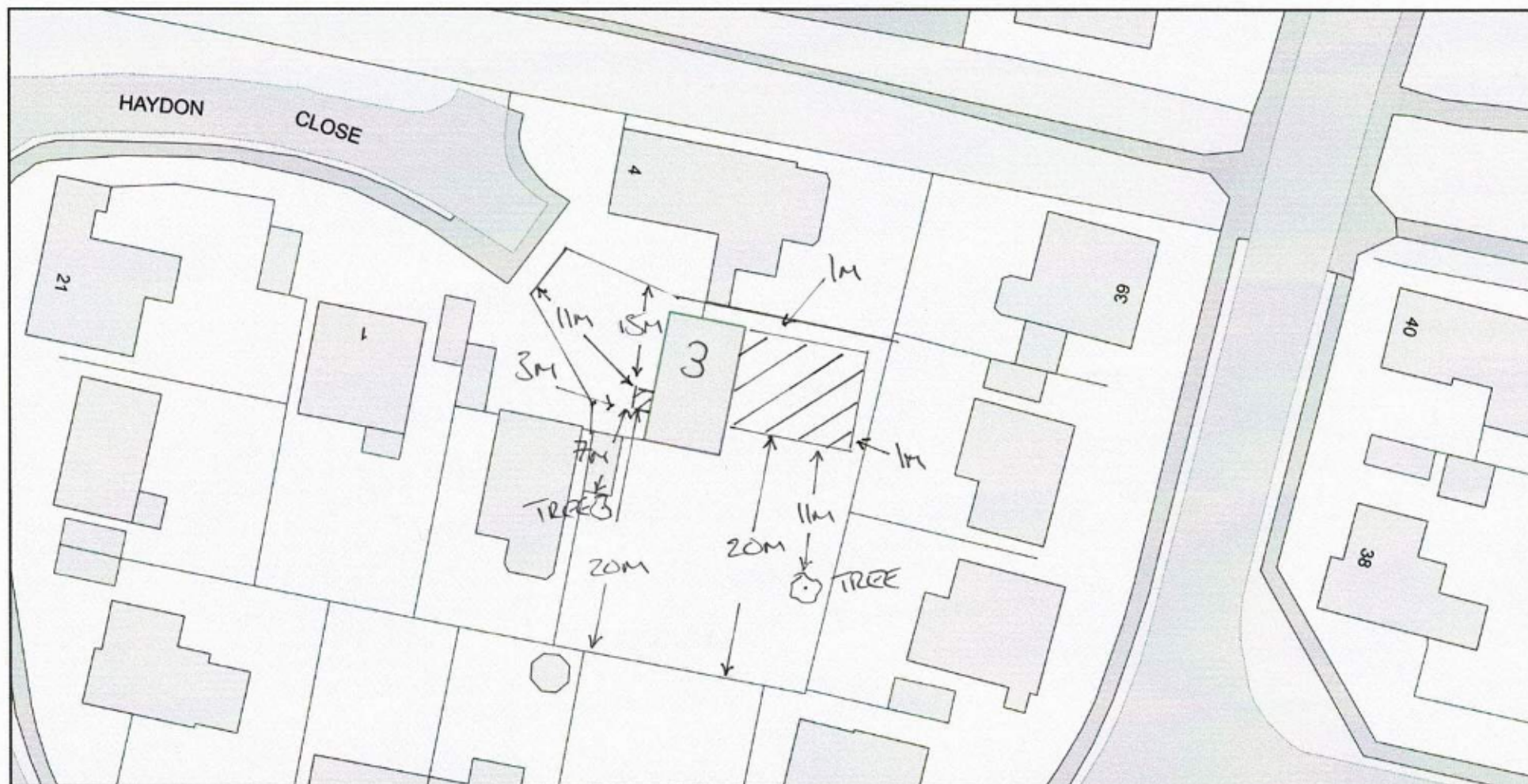
NORTH

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Mr. & Mrs. Vitanyi
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West Sussex PO21 4LG
EXISTING ELEVATIONS
Date: JAN 2021 Scale 1:100 Dw no. EX.EL 01

BLOCK PLAN 3 HAYDON CLOSE BOGNOR REGIS



0 20
Metres



Plan Produced for: MRS. VITANYI

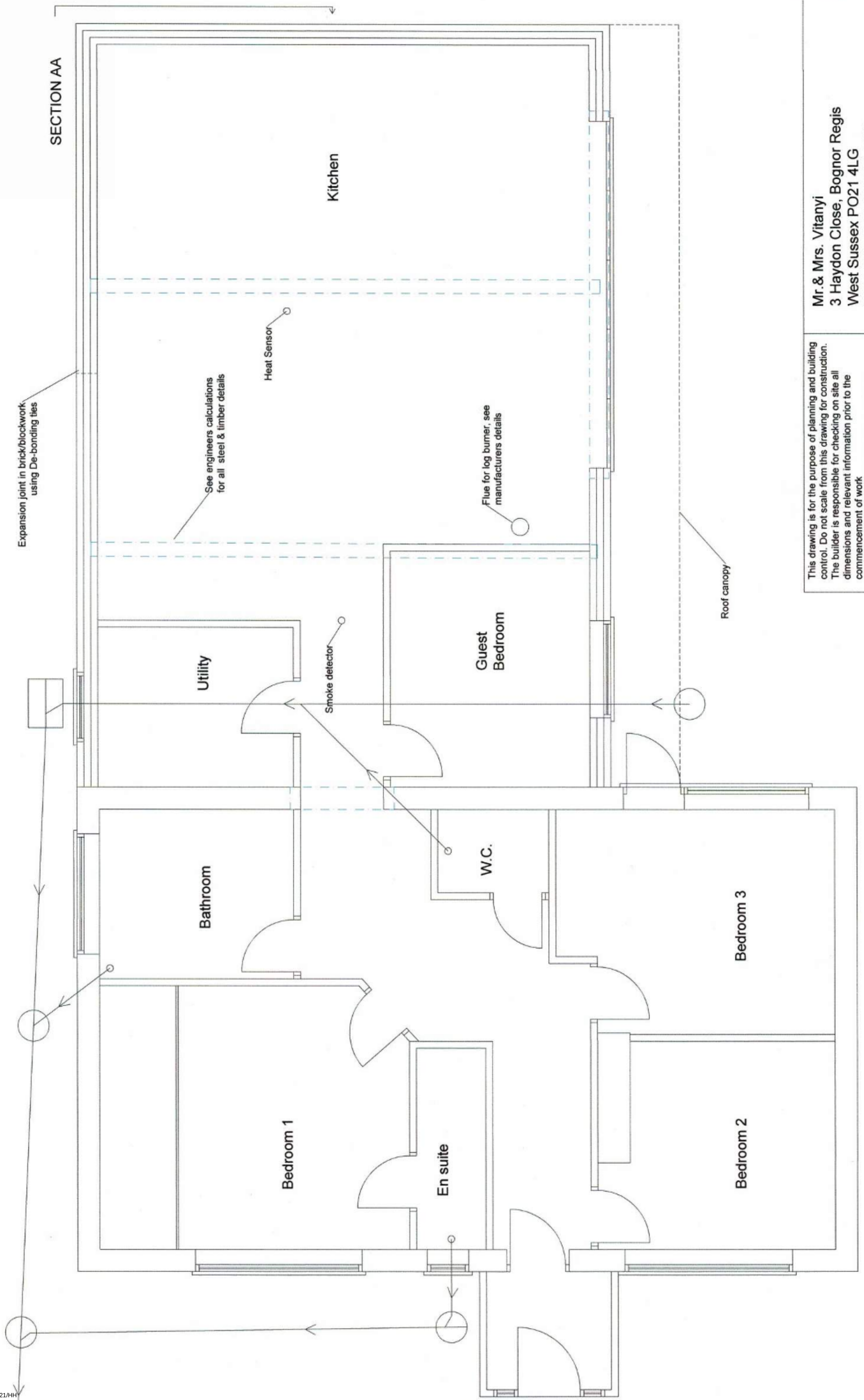
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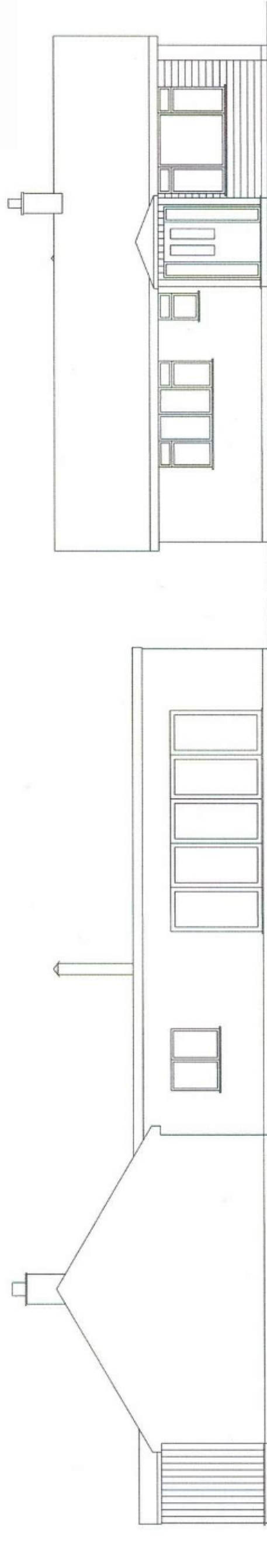




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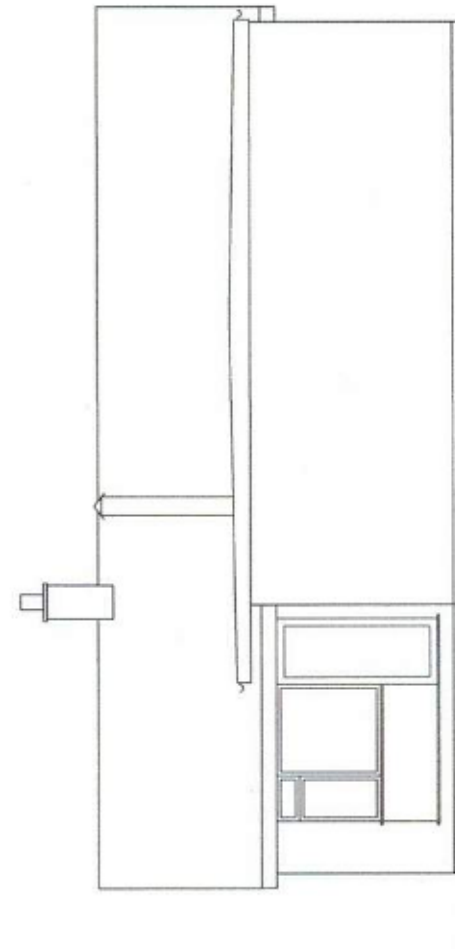
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West Sussex PO21 4LG
PROPOSED FLOORPLANS
Date: JAN 2021 Scale 1:50 Dw no. PR.FP. 06

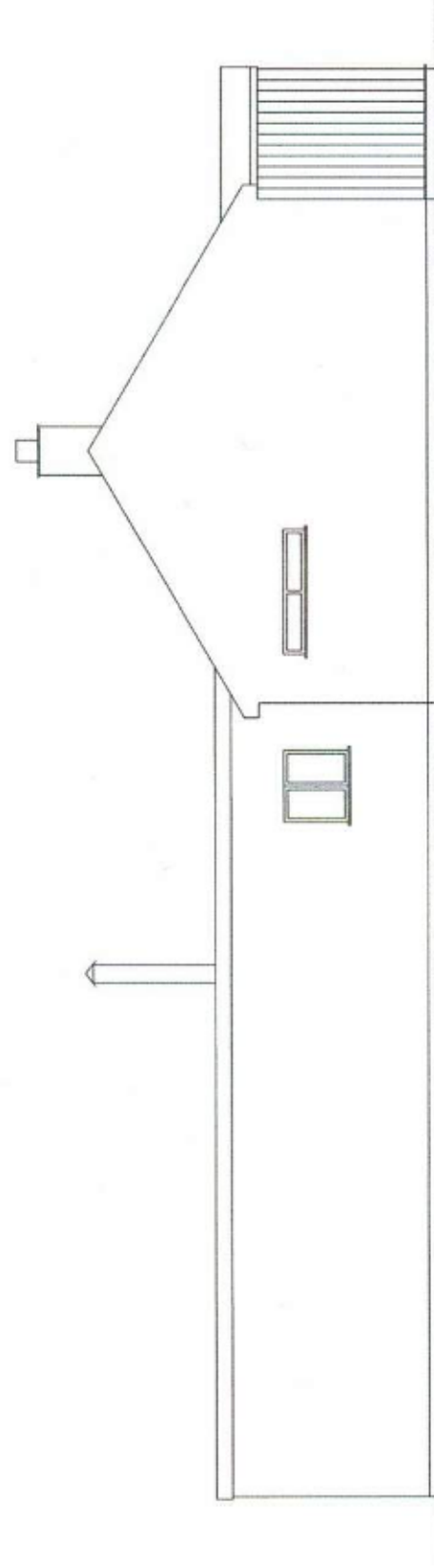


SOUTH

WEST



EAST



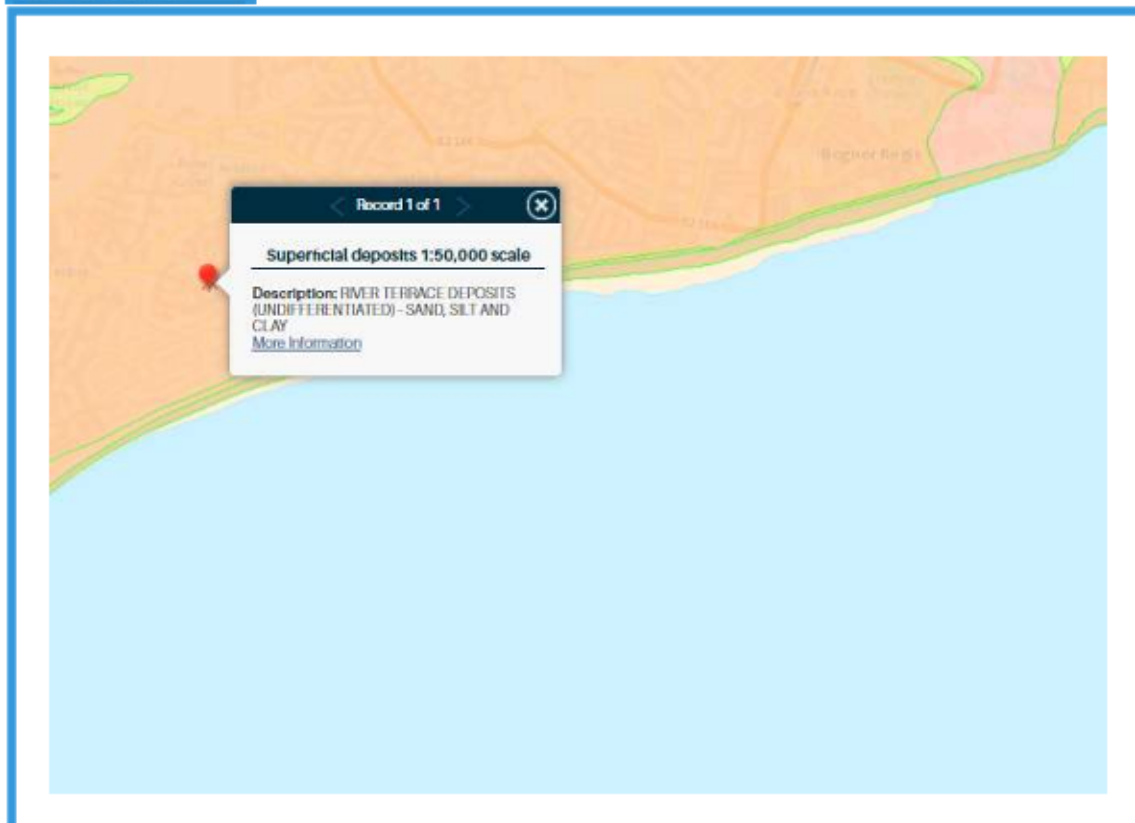
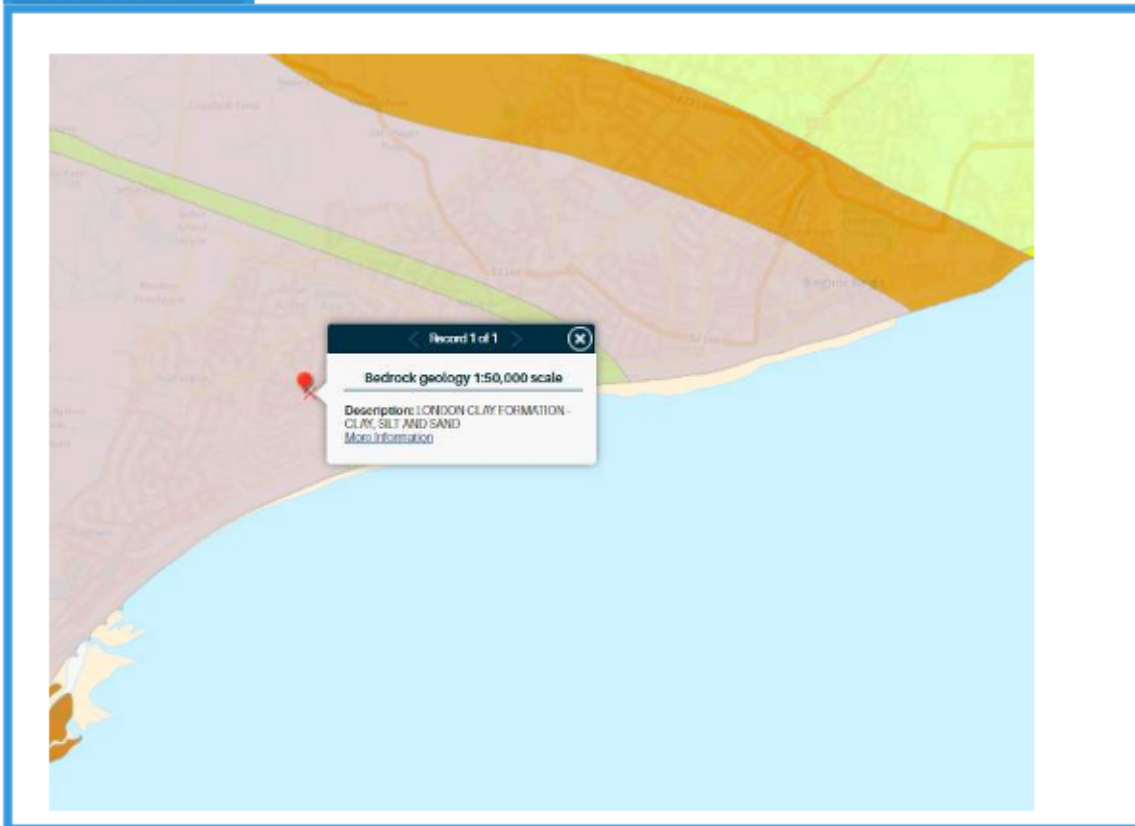
NORTH

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Mr. & Mrs. Vitanyi
3 Haydon Close, Bognor Regis
West Sussex PO21 4LG
PROPOSED ELEVATIONS
Date: JAN 2021 Scale 1:100 Dw no. PR.EL 06

Appendix C





Main River Map



SITE FLOOD RISK

Low risk means that each year this area has a chance of flooding of between 0.1% and 1%. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

 **Flood risk from surface water**

 **Extent of flooding**



 **Flood risk from reservoirs**

 **Extent of flooding**



Flood map for planning

Your reference
3 Haydon Clo

Location (easting/northing)
490255/98419

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4 Feb 2021 23:27

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Scale

1:2500

Created

4 Feb 2021 23:27

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

0 20 40 60m

Householder and other minor extensions in Flood Zone 2 and 3

This guidance is for domestic extensions and non-domestic extensions where the additional footprint created by the development does not exceed 250sq. metres. It should NOT be applied if an additional dwelling is being created, e.g. a self contained annex. In this instance consult the Environment Agency.

We recommend that:

Planning Authorities:

- 1) Refer the applicant to the standing advice pages on the Environment Agency website or provide them with a copy of this page for them to include as part of the planning application submission.
- 2) Check the planning application to ensure that one or other of the mitigation measures from the table below has been incorporated.

Applicants:

Complete the table below and include it with the planning application submission. The table, together with the supporting evidence, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority (LPA) that flood risk issues have been adequately addressed.

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'.
Either; Floor levels within the proposed development will be set no lower than existing levels AND, flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques, to be included in accordance with ' <i>Improving the flood performance of new buildings</i> ' CLG (2007)	Yes
OR; Floor levels within the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum ¹	N/A

Subterranean/basement extensions

Due to the risk of rapid inundation by floodwater basements should be avoided in areas at risk of flooding. The LPA may hold additional guidance for basement extensions.

Self-contained basement dwellings are 'highly vulnerable' development and should not be permitted in Flood Zone 3. We are opposed to these developments.

¹ Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour lines on Ordnance Survey maps measure heights above OD for example, though these are not accurate enough for flood risk assessment.

Cumulative impact of minor extensions and the removal of Permitted Development rights.

There is potential for cumulative impact of minor extensions to have a significant effect on flood risk. Where local knowledge (Strategic Flood Risk Assessment held by the LPA/information provided by the parish council) suggests this is the case the guidance contained in FRA guidance note 2 should be applied. FRA guidance note 2 can also be applied where permitted development rights have been removed for flood risk reasons. The Environment Agency does not usually comment on minor development in this category.

Permeable paving and changes to permitted development rights for householders

On the 1st October 2008 the General Permitted Development Order (GPDO) in England was amended by the Government (Statutory Instrument 2008 No. 2362).

One of the changes introduced by the GPDO amendment is the removal of permitted development rights for householders wishing to install hard surfacing in front gardens which exceeds 5sq. metres (i.e. 1m x 5m) without making provision to ensure permeability. This means that use of traditional materials, such as impermeable concrete, where there is no facility in place to ensure permeability, requires an application for planning permission.

In order to help and advise householders of the options for achieving permeability and meeting the condition for permitted development status the Department for Communities and Local Government (CLG) has produced guidance on permeable paving which can be found on the following link <https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance>

The Environment Agency supports the GPDO amendment as it is in line with the recommendation of the Pitt Report regarding the need to better tackle the impact of surface water flooding. However, Local Planning Authorities should determine these applications in accordance with the CLG guidance **without** consulting the Environment Agency.

End of comment