

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

Our ref: HA/2020/122048/01-L01
Your ref: BN/15/20/PL
Date: 05 March 2020

Dear Sir/Madam

ERECTION OF 1 NO.END OF TERRACE TWO STOREY 2-BEDROOM DWELLING.

LAND ADJACENT TO 49 WARREN WAY BARNHAM PO22 0JX

Thank you for the consultation on the above application, please quote our reference on all correspondence.

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.

Reason(s)

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 Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the development's flood risks. In particular, the FRA fails to:

- Submit an up to date FRA to reflect the new application
- Clearly state finished floor levels for the dwelling

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

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.



If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency 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.

Advice to Applicant

The proposed two storey dwelling falls within flood zone 3 (High Risk) of fluvial flooding. Plans show that there will be no sleeping accommodation on the ground floor therefore occupants will have safe refuge from flood risk on upper floor.

The boundary of the proposed dwelling will have a distance of 1.6m from a main river (Barnham Rife). Previous objections for the two storey extension were due to uncertainties of a FRAP being issued as we had insufficient details of foundations, therefore raising concerns on the stability of the bank. However, the applicant previously submitted further details relating to building foundations, which helped us in advising what we would need at the FRAP application stage.

The submitted FRA is the same as previously submitted, which used standing advice for a minor extensions. Therefore one of the mitigation measures outlined was to set finished floor levels no lower than existing. However, this application is for a new dwelling, therefore we would need a new flood risk assessment which clearly states the finished floor levels. The applicant should also resubmit information regarding the building foundations and how the river bank will not be compromised.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place on or within 8 metres of a main river.

The boundary of the proposed extension will have a distance of 1.6m from a main river (Barnham Rife) with previous objections relating to uncertainties of a Flood Risk Activity Permit (FRAP) being issued. This raised concerns relating to the stability of the bank due to insufficient details of foundations under the proposed extension being supplied.

As we have now received more information relating to building foundations, we are able to advise further on particular information we would need for the FRAP application:

- Accurate measurements of the foundation piling that show that piling shall reach a lower level than the river bed. We must be satisfied with the bank stability and that the extension will be adequately supported should undercutting of the bank occur
- Precise Drawings/ plans of where material will be stored to ensure no pollutants enter the river
- Photos of the site before works are carried out to ensure both the river and the bank have been returned to their previous state after works are completed

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

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 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.

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 Planning Practice Guidance (PPG).

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

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.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

