

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

**Our ref:** HA/2022/123911/01-L01  
**Your ref:** BR/247/21/PL  
**Date:** 02 February 2022

Dear Sir/Madam

**CHANGE OF USE FROM SINGLE DWELLING (C3) TO 6 NO SELF-CONTAINED FLATS (C3), A 10-BEDROOM CO-LIVING HOUSING UNIT (SUI GENERIS) & INSERTION OF 3 NO NEW FRONT WINDOWS. ANCIENT MARINER HOTEL 59 WEST STREET BOGNOR REGIS PO21 1XB**

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

**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**

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 flood risks posed by the development. In particular, the FRA fails to:

- Take the impacts of climate change into account and provide a comparison between finished floor levels and modelled flood levels
- Consider how a range of flooding events (including extreme events) will affect people and property

We would also note that the property is in Flood Zone 3b rather than Flood Zone 3a as the application states. The FRA will need to be revised in light of this.

**Overcoming our Objection**

Environment Agency  
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.  
Customer services line: [REDACTED]  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

To overcome our objection, the applicant should submit a revised FRA and amended plans which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

### **Advice to Applicant**

#### **FRA sources of information**

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact [REDACTED] Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

A checklist on what should be included in a flood risk assessment can also be found on the gov.uk website here –

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section>. ]

#### **Advice to the Local Planning Authority**

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

If you are minded to grant permission against our advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

*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.*

### **Advice to Applicant**

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.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

**Mrs Sophie Brown**  
**Sustainable Places Planning Advisor**



End

3