

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

Our ref: HA/2020/122640/02-L01
Your ref: FP/180/20/PD
Date: 24 November 2020

Dear Sir/Madam,

ADDITIONAL INFORMATION - NOTIFICATION OF PRIOR APPROVAL UNDER SCHEDULE 2, PART 3, CLASS M OF THE TOWN & COUNTRY (GENERAL PERMITTED DEVELOPMENT (ENGLAND) ORDER (AS AMENDED) FOR THE CHANGE OF USE FROM SHOP (A1) TO RESIDENTIAL (C3).

23A FELPHAM ROAD FELPHAM PO22 7DA

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

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

Environment Agency position

In the absence of a Flood Risk Assessment (FRA), we **maintain our objection** to this application and recommend that planning permission is refused.

Reasons

This application does not fall under Flood Risk Standing Advice as it is a change of use, not a householder, application. As the application involves an increase in vulnerability within Flood Zone 3, a full FRA is required. Flood Zones 2 and 3 is land defined by the Planning Practice Guidance for the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change as having a high and medium probability of flooding.

Guidance on flood risk vulnerability classification can be found here:
<https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.

[Redacted signature]

Cont/d..

Overcoming our objection

To overcome our objection, the Applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

If this cannot be achieved, we are likely to maintain our objection.

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

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.

Sources of information for an FRA

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 email [REDACTED] and request a 'Product 4' or flood data for your site location. When sending a request, please also send a plan identifying the site boundary. Requests are usually dealt with within 20 working days.

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.

Guidance on how to prepare a flood risk assessment can be found on the gov.uk website here - <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

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>.

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

