

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

**Our ref:** HA/2021/123332/01-L01  
**Your ref:** FP/90/21/PD  
**Date:** 12 July 2021

Dear Sir/Madam

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

- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme undefended events) will affect people and property
- consider how flood defences can fail or be overtopped, therefore undefended scenarios need to be used
- 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
- consider how placing sleeping accommodation on the ground floor, with no safe refuge on upper floors, places occupants at a danger of flood risk

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..

- consider the need for mitigation measures, taking into account the increased vulnerability of the change of use
- take the impacts of climate change allowances into account using the undefended scenarios. Guidance is available at ['Flood risk assessments: climate change allowances'](#)

### **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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

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**

