




To: Planning.Responses

Subject: Environment Agency Response to: F/4/17/PL

The proposal has been reviewed and I enclose the Environment Agency's comments on:

Rife Cottage
1 Station Road
Ford
Arundel
West Sussex
BN18 0BJ

LPA ref: F/4/17/PL

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

Our ref: HA/2017/119191/02-L01
Your ref: F/4/17/PL

Date: 13 June 2017

Dear Sir/Madam

Exisiting ancillary building to be used as a tourist unit. Resubmission of F/17/16/PL.

Rife Cottage, 1 Station Road, Ford, Arundel, West Sussex, BN18 0BJ

Thank you for consulting the Environment Agency on the above planning application. We have reviewed the submitted plans and supporting Flood Risk Assessment (FRA) and have the following comments to make.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:

According to Environment Agency maps and records the proposal is shown to be within a Flood Zone 3 (high risk area). Furthermore the nature of the proposal is what is known as 'highly vulnerable' as set out in the government guidance National Planning Policy Framework (NPPF).

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

Under the NPPF and supporting PPG, development should be designed to ensure occupants remain safe from flooding up to the 'design flood' (i.e. 1% (1 in 100) annual probability fluvial / 0.5% (1 in 200) annual probability tidal) including an appropriate allowance for climate change.

Whilst it is stated that the existing floor levels are to be raised 600mm, information has not been provided as to what the existing ground floor levels of the ancillary building are. The Product 4 information provided by the Environment Agency gives an undefended 1 in 200 tidal flood risk level of 4.04mAOD. For any potential occupants to be safeguarded from flooding, finished floor

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levels will need to be above this level. Therefore the existing ground floor level needs to be provided so as a comparison can be made.

We would also not support a void under a building, as a means of flood flow conveyance, in a severe flood scenario, due to the risk of blockages which could form.

Additionally, as there is no available safe refuge on an upper floor, removing the need for evacuation, the evacuation procedures identified would need to be approved by the local authority's Emergency Planning Officer.

Finally it has not been verified whether the tourist accommodation is proposed to be all year round. If it cannot be demonstrated that the building can be constructed/raised to a suitably safe level above 4.04metres AOD, all year occupancy would result in a continued objection. Alternatively if the required level cannot be achieved, but the tourist proposal is for part of the year only (i.e. April 01 to September 30) then we would be more flexible and subject to appropriate mitigation it is possible that we could request a condition time limiting occupation.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours faithfully

Mrs Laura Lax
Senior Planning Advisor

