

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

Our ref: HA/2015/117322/01-L01
Your ref: LU/228/15/PL
Date: 18 August 2015

Dear Ms Gardner

**CONVERSION OF GROUND & FIRST FLOOR AT THE REAR INTO TWO 2
BEDROOM FLATS
10 ST CATHERINES ROAD LITTLEHAMPTON BN17 5HS**

Thank you for your consultation on this proposal. Please quote our reference number in any correspondence.

Environment Agency Position

In the absence of a flood risk assessment (FRA), we object to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted.

Reasons

The application site lies within Flood Zone 3 defined by the Environment Agency Flood Map as having a high probability of flooding. Paragraph 103, footnote 20 of the National Planning Policy Framework (NPPF) requires applicants for planning permission to submit an FRA when development is proposed in such locations.

An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission.

Overcoming our objection

You can overcome our objection by undertaking an FRA which demonstrates that the development is safe without increasing 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.

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

[Redacted signature block]

Cont/d..

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 reconsultation. Our objection will be maintained until an adequate FRA has been submitted.
In particular, the FRA should:

1. *Acknowledge that the development is in Flood Zone 3*
2. *Consider how people will be kept safe from flood hazards identified*
3. *Consider the effect of a range of flooding events including extreme events on people and property.*
4. *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. Especially for the groundfloor flat that has no safe refuge.*
5. *Living accommodation should be 300mm above the 1 in 100 climate change flood level and sleeping accommodation 600mm above the 1 in 100 climate change flood level.*

Yours sincerely

Mrs Sophie Brown
Sustainable Places Planning Advisor

