

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

**Our ref:** HA/2020/122744/01-L01  
**Your ref:** LU/295/20/PL  
**Date:** 09 December 2020

Dear Sir/Madam

**FULL PLANNING APPLICATION INCORPORATING PERMITTED CHANGE OF USE OF PART OF EXISTING OFFICE (A2 PROFESSIONAL & FINANCIAL SERVICES) & USE TO FORM 2 NO. DWELLINGS (C3 DWELLING HOUSES) ON THE TWO UPPER FLOORS (RESUBMISSION FOLLOWING LU/107/20/PL). THIS SITE IS IN CIL ZONE 4 (ZERO RATED) AS FLATS. 15 BEACH ROAD LITTLEHAMPTON BN17 5HZ**

Thank you for 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 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 events) will affect people and property
- 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
- take the impacts of climate change into account

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..

- There is no assessment of the impact of climate change using appropriate climate change allowances 'Flood risk assessments: climate change allowances'
- Include Flood risk mitigation measures that address flood risk for the lifetime of the development in the design
  - Raised finished floor levels
  - Resistance and resilience measures
  - Safe access and egress routes

### **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'll respond within 21 days of receiving it. Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

### **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.

*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**

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

We do not prepare or provide FRAs. However, our Customers and Engagement team can provide any relevant flood risk information that we have available (including climate change data). Please contact [REDACTED] and ask for a 'Product 4' including climate change levels and allowances. When sending your request, do also include a location map for the site. Requests are usually dealt with within 20 working days. Please detail the areas of interest and provide a site plan to ensure that our team gives you data specific to the areas that it is needed.

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 here – <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

### Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.

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**

