

Arun District Council
Planning Policy
1, Arun Civic Centre Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2020/121939/02-L01
Your ref: LU/376/19/PD
Date: 24 March 2020

Dear Sir/Madam

REVISED FRA - CHANGE OF USE OF PART OF BUILDING FROM A USE FALLING WITHIN CLASS B1 (A)(OFFICES), TO A USE FALLING WITHIN CLASS C3 (DWELLINGHOUSES)

GRATWICKE HOUSE 10 EAST STREET LITTLEHAMPTON BN17 6AW

Thank you for the consultation on the above application, please quote our reference on all correspondence.

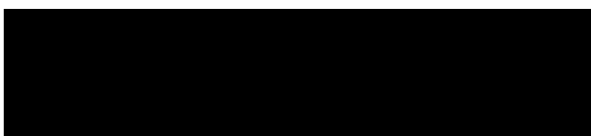
The application is for a change of use from offices to residential dwellings in flood zone 3 (High Risk). Although the new FRA correctly states that the application site is in flood zone 3, it still states that it is low risk which is incorrect. It also states that the site is not within the flood extent with breaching, when the site is within the 2115 flood extent in both defended and undefended scenarios.

The FRA also states that there is no site specific modelling data available for the site, whereas there is data available and was provided to ARK Environmental Assessment on 13/03/2020. We have no record of request for product 4 data prior to this. Although there is mention of evacuation, this is insufficient due to the vulnerability of the dwelling and the site being in flood zone 3 (high risk).

Therefore the applicant must submit a full flood evacuation plan with the FRA. As a result we are holding our objection and request that the applicant utilises product 4 information with flood levels and depths for the site, demonstrates that occupants will remain safe for the lifetime of the development and produce a full evacuation plan for occupants to use in case of a flood event.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to this



Confidential

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 development's flood risks. In particular, the FRA fails to:

- **Utilise product 4 flood level and depth data for the site**
- **Accurately state the flood risk at the site. The site is located wholly within flood zone 3, therefore is at high risk of flooding**
- **take the impacts of climate change into account**
- **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**
- **provide a flood emergency and evacuation plan given the risk of the site and the vulnerability of the development**

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

Flood warning and emergency response - advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The planning practice guidance to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

Yours faithfully

Cont/d..

Miss Suz Greenwood
Planning Advisor, Environment Agency

