

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

Our ref: HA/2019/121264/02-L01
Your ref: M/25/19/PL
Date: 03 September 2019

Dear Sir/Madam

Amended docs- revised FRA. Replacement dwelling

27 Central Drive, Elmer, PO22 7TT

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

The proposed replacement dwelling is located in flood zone 3 and is at high risk of tidal flooding. Resubmission of the flood risk assessment shows that the finished floor levels of the ground floor shall be set at 4.41mAOD, which is higher than existing (4.11mAOD) but would still be at risk to flooding as future flood levels are 5.00mAOD, meaning the ground floor could be susceptible to 590mm flood depths during the lifetime of the development.

Although primary living accommodation will be located on the first floor (set at 7.00mAOD), there will still be a bedroom on the ground floor. Due to the level of risk this would usually lead to an objection. However as previous dwelling was a bungalow, this development would be providing a betterment as occupants will now have safe refuge on the first floor.

Following the resubmission of the FRA we are happy to **remove our outstanding objection subject to the inclusion of the following condition**, in any permission granted.

We consider that planning permission could be granted to the proposed development, as submitted, if the following planning condition is included as set out below. Without this condition, the proposed development on this site poses an unacceptable risk and we would object to the application.

Condition – Implementation of Flood Risk Assessment

The development shall be carried out in accordance with the submitted flood risk assessment (resubmitted by Ivon Blumer Architects on May 2019) and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 4.41m above Ordnance Datum (AOD)
- Mitigation measures shall be incorporated including construction materials of the first 600mm of the ground floor that are capable of withstanding the potential risk of flooding and the use of floodgate systems of all door openings

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.



These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason

In line with section 9 of the Planning Practice Guidance of the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change to reduce the risk of flooding to the proposed development and future occupants.

Advice to Local Planning Authority/Applicant

Flood proofing

We strongly recommend the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. In the meantime, if you'd like to find out more about reducing flood damage, visit the flood risk and coastal change pages of the planning practice guidance. The following documents may also be useful:

Department for Communities and Local Government: Preparing for floods

<http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf>

Department for Communities and Local Government: Improving the flood performance of new buildings:

<http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>

Flood warning and emergency response

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).

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

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