

Mr Ben Daines
Adur & Worthing Councils
Planning Policy
Portland House Richmond Road
Worthing
West Sussex
BN11 1LF

Our ref: HA/2014/115582/CS-
03/EW1-L01

Date: 22 March 2017

Dear Mr Daines

Adur Local Plan Submission 2016

Inspector Note ID/6 – Safe access and egress

Thank you for consulting the Environment Agency on your proposed response to the Inspector's note regarding safe access and egress to developments during flood events (ref. ID/6).

We have the following advice on the content of your response:

Environment Agency Advice

We have no major issues with your suggested response to the Inspector, but have provided the following advice to clarify our position.

Paragraph 100 of the NPPF states that where development is necessary in areas of flood risk, it should be made safe.

In demonstrating that any development is safe, and therefore satisfies the second part of the Exceptions Test (as required by all residential proposals in Flood Zone 3), safe access and egress should be addressed, where it is important to the overall safety of the development.

In all such circumstances, we recommend that the Local Planning Authority consult with the relevant emergency planners at their authority, or the local Fire & Rescue Service.

We do not normally comment in detail on matters of safe access and egress, or the content of flood emergency response plans, as we do not carry out these roles during a flood.

All local authorities are 'category one responders' under the Civil Contingencies Act. This means that they must have plans in place to respond to emergencies, and control

Cont/d..



or reduce the impact of an emergency. The approval of development within flood risk areas increases this future burden on the authority.

It is therefore the Local Authority who are best placed to advise on whether safe access and egress, and any emergency flood response plans, are required to make the development safe overall, and if so whether any proposed arrangements are acceptable.

I hope this clarifies that, although we do not typically assess safe access and egress, it is still an issue that needs to be considered when allocating or determining any development in areas of flood risk.

You are correct in that there is a distinction between safe access and egress and safe refuge.

Safe access and egress is the safe free movement of people to and from a property during a flood event (usually the design flood event, which for tidal flooding is the 1 in 200 year event) taking into account the impacts of climate change.

Safe refuge involves access to a place of safety during a flood event, which could be internal to the building at risk (e.g. habitable accommodation at a higher floor).

Whether development proposals unable to achieve safe access and egress require mitigation measures to make the development safe, such as flood emergency response plans, which may need to identify safe refuge as an element, is a matter for the Local Planning Authority to decide.

Safety during an extreme flood event (1 in 1000 year flood) or flood defence breach scenario) should also be a consideration, including whether a flood emergency response plan is required, as stated in the PPG.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely

Mr David Griggs
Planning Advisor

Direct dial 02030 259625

Direct e-mail PlanningSSD@environment-agency.gov.uk