

Ms Jill Day
Exeter City Council
Planning Services
Civic Centre Paris Street
Exeter
Devon
EX1 1JN

Our ref: DC/2019/121131/01-L01
Your ref: 19/1676/FUL
Date: 07 January 2020

Dear Ms Day

**DEMOLITION OF EXISTING SINGLE STOREY BUSINESS PREMISES AND
CONSTRUCTION OF 9NO RESIDENTIAL APARTMENTS ALONG WITH ON-SITE
PARKING AND ASSOCIATED LANDSCAPING.
ST ANDREWS YARD WILLEYS AVENUE EXETER DEVON EX2 8EP**

Thank you for consulting us on this application.

Environment Agency position

We object to the proposed development on the grounds of flood risk. The reason for this position and advice is provided below.

Before you determine the application, your Authority will also need to be content that the flood risk Sequential Test has been satisfied in accordance with the National Planning Policy Framework (NPPF) if you have not done so already. As you will be aware, failure of the Sequential Test is sufficient justification to refuse a planning application.

Reason – The site is located within Flood Zone 3 identified by Environment Agency Flood Maps as having a high probability of flooding. The submitted Flood Risk Assessment (FRA) (V1, dated 16th August 2018) and planning drawings do not demonstrate that the development will be safe from flooding over its lifetime. We also consider that the FRA does not comply with the requirements for a site-specific flood risk assessments set out in the planning practice guidance. The submitted planning drawings also do not show the proposed finished floor levels (FFL) or site levels meaning the flood risk cannot be fully assessed.

We would recommend that your authority consults the Emergency Planning Team regarding Access and Egress.

We note that this application is connected to the previously refused application (reference 18/1610/FUL). We considered that the FRA and FRA addendum (dated 3rd July 2019) submitted within the previous application were acceptable. For convenience,

Environment Agency
Manley House Kestrel Way, Sowton Industrial Estate, Exeter, EX2 7LQ.
Customer services line: 03708 506 506

www.gov.uk/environment-agency

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the response to the previous application is copied as follows:

“Further to the FRA addendum v2 3 July 2019, we can accept the conclusions and recommendations to deal with Flood Risk (point 1 to 4) and remove our objection.

The addendum/design has raised the minimum FFL to 8.6mAOD, and provided a means of safe refuges for the ground floor units (1 &2), in the hallways on the upper floors. Given the design constraints and although this is not our preferred approach, this is a matter for the LPA and its emergency planner on whether this is a suitable refuge given the people at risk, duration of flooding and lack of services”.

If our concerns can be overcome with regards to the above, we would wish to recommend conditions relating to the management of contaminated land on site. We can recommend the wording for these conditions on any re-consultation that results in the removal of our objection.

Overcoming our objection

The applicant may overcome our objection by submitting further information to cover the deficiencies within this letter. This includes providing FFLs, and submitting an FRA that fully assesses the flood risks to and from the site.

Please contact us again if you require any further advice.

Yours sincerely

Harriet Fuller
Planning Advisor

Direct dial 02030256485
Direct e-mail spdc@environment-agency.gov.uk

cc GJR Architects