

Folkestone Hythe District Council
Development Control
Civic Centre Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Our ref: KT/2019/126444/01-L02
Your ref: Y19/0024/PA
Date: 08 January 2020

Dear Sir/Madam

Determination as to whether the prior approval of the local planning authority is required under class q of the town and country planning (general permitted development) (england) order 2015 for the change of use and conversion of 3 x agricultural units to 3 x residential dwellings (class c3).

School Farm, School Road, St Mary In The Marsh, Romney Marsh, Kent TN29 0DG

Thank you for consulting us on the above. In the absence of a flood risk assessment (FRA), we **OBJECT** to this application and recommend that planning permission is refused.

Reasons:

The application site lies within flood zone 3 which is land defined by the planning practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 163, footnote 50) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the proposed development's flood risk is unknown. This is sufficient reason for refusing planning permission.

Whilst we accept that this is a change of use application and therefore not subject to the Sequential or Exception Tests the proposal should still meet the requirements for flood risk assessments. This is particularly important with this application which both increases the vulnerability classification and proposes single-storey accommodation.

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. As a minimum we would expect to see details of design flood levels and proposed finished floor levels.

If this cannot be achieved, we are likely to maintain our objection. Please consult us with the FRA 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>

Yours faithfully

Ms Jennifer Wilson
Planning Specialist

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