

Mr Leigh Powell  
Exeter City Council  
Development Management  
Civic Centre Paris Street  
Exeter  
Devon  
EX1 1JN

**Our ref:** DC/2022/122995/02-L01  
**Your ref:** 22/1548/FUL  
**Date:** 24 April 2023

Dear Mr Powell

**RENOVATION, CONVERSION AND CHANGE OF USE EXELAND HOUSE FROM RETAIL UNIT AND OFFICE TO FORM A CO-LIVING SCHEME OF 38 UNITS INCLUDING COMMUNAL FACILITIES AND A CO-WORKING OFFICE SPACE, FRONT EXTENSION WITH 4 FLOORS, LINK BUILDING, PUBLIC PLAZA ON THE EXISTING CAR PARK AND RENOVATION OF EXISTING BRIDGE LINK TO NEW BRIDGE STREET.  
EXELAND HOUSE TUDOR STREET EXETER DEVON EX4 3BR**

Further to our letter dated 09 January 2023, we have been asked by the architect to clarify our previous comments, in particular whether the Design Flood Level quoted is correct.

#### **Environment Agency position**

We maintain our objection at this stage. The submitted Flood Risk Assessment (FRA) is not considered satisfactory to assess the flood risks to the site, because it has not been informed by the best available flood modelling. We recommend that the application is not determined until a satisfactory FRA has been submitted.

Before determining the application, your Authority will need to be content that the flood risk Sequential Test has been satisfied in accordance with the 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.

The reason for this position is set out in our letter dated 09 January 2023 and further advice on the Design Flood Level is provided below.

#### **Advice – Design Flood Level**

We wish to confirm that the design flood level stated in our previous correspondence are correct for this part of Exeter.

The land levels and corresponding flood levels change with local conditions and the general slope downstream towards the sea. Levels differ greatly throughout Exeter, which is why we provide flood depth (m) and level data (mAOD) in our data products. Tudor Street sits within a manmade bowl surrounded by higher land, and relative flood water depths are higher in this location than other locations in Exeter.

Our flood defence scheme is aimed at reducing risk to existing properties and not for facilitating new residential development within the floodplain. Innovative design is required to deal with the future flood risks exacerbated by climate change and in the long term most new residential development will be required to be at first floor or higher in parts of Exeter and many other communities in Devon & Cornwall, and across the UK.

We hope this provides the clarity needed to enable you to determine this application, but if you have any further queries regarding our advice please let me know.

Yours sincerely

**SARAH SQUIRE**  
**Sustainable Places - Planning Advisor**

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