

Adur & Worthing Councils  
Planning team  
Portland House  
Richmond Road  
Worthing  
West Sussex  
BN11 1LF

**Our ref:** HA/2025/127318/01  
**Your ref:** AWDM/1520/25  
**Date:** 15 December 2025

Dear Planning team (FAO: Jo Morin),

**SUBDIVISION OF EXISTING DWELLING PLOT TO PROVIDE 2 BEDROOM CHALET BUNGALOW STYLE DETACHED HOUSE IN REAR GARDEN WITH PARKING ACCESSED OFF ST JOHN'S AVENUE.**

**94 MARINE CRESCENT, GORING-BY-SEA, WORTHING, BN12 4JH.**

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

We have reviewed the information as submitted and set out our position and comments below.

### **Environment Agency position**

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 Practice Framework (NPPF) (paragraph 181, footnote 63) and the Flood Risk and Coastal Change Planning Practice Guidance (paragraphs 20 and 21) 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 flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

## **Overcoming our objection**

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us if an FRA is submitted and we will respond within 21 days of re-consultation.

Guidance on how to prepare a flood risk assessment can be found at [Flood risk assessments: applying for planning permission - GOV.UK](#)

If you have any queries regarding the above information, please do not hesitate to contact the advisor identified below.

Yours faithfully

### **Environment Agency – Solent & South Downs**

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