creating a better place
for people and wildlife

Environment Agency

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

Our ref: HA/2023/125213/01
Your ref: AWDM/0666/23

Date: 19 July 2023

Dear Planning team (FAO: Marie O'Keeffe),

CHANGE OF USE TO CONVERT THE FIRST, SECOND AND THIRD FLOORS TO RESIDENTIAL TO CREATE A FOUR BEDROOM FLAT.

5 BATH PLACE, WORTHING, WEST SUSSEX, BN11 3BA.

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 an acceptable Flood Risk Assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Consider how people will be kept safe from the identified flood hazards.
- Consider how a range of flooding events (including extreme events) will affect people and property.
- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.
- Take the impacts of climate change into account:
    - there is no assessment of the impact of climate change using appropriate climate change allowances 'Flood risk assessments: climate change allowances'.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Whilst we appreciate the change of use application concerns the first, second and third floors of the building, the FRA states that there is no risk of flooding without providing any evidence. The applicant should apply for a 'product 4' data pack from us (see below) and use the information in the pack to update the FRA to show the predicted flood level in comparison with finished floor levels of the sleeping accommodation.

Please re-consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

How to obtain a product 4 data pack

Our Customers and Engagement team can provide any relevant flood risk information that we have available. Please email SSDEnquiries@environment-agency.gov.uk to request a 'product 4' data pack which will be provided at no charge. When sending a request, please do also provide a map identifying the site location.

Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available.

Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: https://www.gov.uk/guidance/flood-risk-and-coastal-change#para80.

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

Sustainable Places Advisor: Anna Rabone
Direct dial: 02077 140525
Direct e-mail: anna.rabone@environment-agency.gov.uk

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