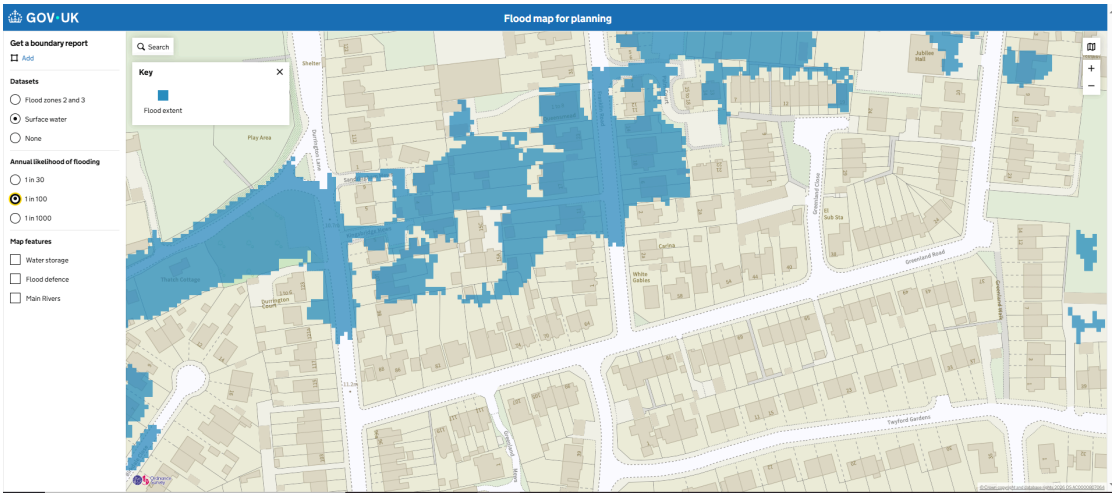
PLANNING POLICY COMMENTS

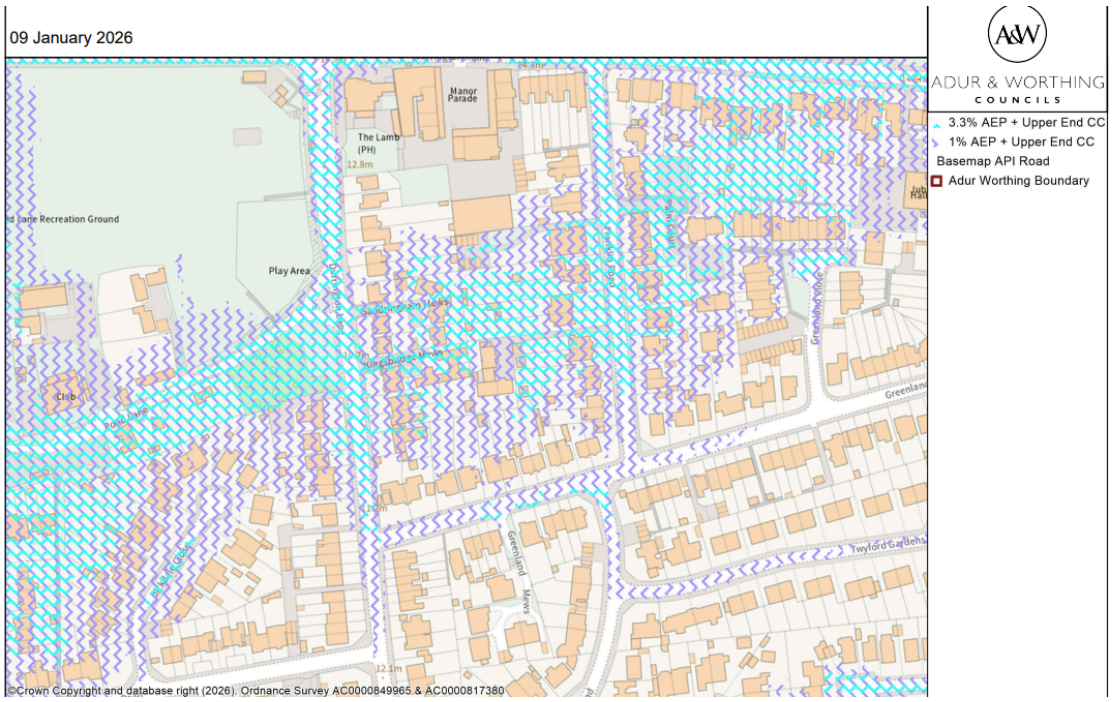
Application Number	**AWDM/1322/25**
Location	**17 Franklin Road Worthing West Sussex BN13 2PG**
Proposal	**Development of a detached bungalow in the rear garden with access drive from Franklin Road**
DM Officer	**Jo Morin**
Sent to Policy	**08/01/2025**
Policy Officer	**Cat Hutchins**
Returned to DM	**09/01/2025**

Key Issues / Policies

Planning policy have been requested to review this application in relation to flood risk. A Flood Risk Assessment & Surface Water Drainage Strategy (dated June 2025) has been submitted with the application. This highlights that the site is at a high risk of surface water flooding. This is in accordance with the national flood map for planning which shows the majority of the site affected in the 1 in 100 year present day surface water flood event. The site is not at risk of tidal or fluvial flooding.



The flood map for planning does not yet provide mapping for surface water plus climate change (this is expected to be published towards the end of this month). Until this is available the Adur & Worthing Level 1 Strategic Flood Risk Assessment (2024) Appendix G is the most up to date mapping of risk of flooding from surface water with climate change allowances. Using the 45% climate change allowance this shows an increase in risk to the area.



The NPPF (2025) paragraphs 173, 174, 175 sets the requirement for the sequential test for all sources of flooding. As detailed in paragraph 174 ‘Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding’. Further guidance is given in the Planning Practice Guidance Paragraph: 027 Reference ID: 7-027-20220825 (Revision date: 17 09 2025) which clarifies that a proportionate approach should be taken and that where a site specific flood risk assessment demonstrates that occupiers and users would remain safe from current and surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere, then the sequential test need not be applied.

We understand planning policy has been asked to review the submitted sequential test as our drainage consultants have advised that the condition has not currently been met. Should their concerns be resolved and a submitted flood risk assessment meets these conditions then the sequential test will no longer be required as set out in Paragraph 027 of Planning Practice Guidance on flood risk and coastal change.

The submitted ‘Flood Risk Sequential Assessment’ should be based on the consideration of the site being at a high risk of surface water flooding and have regard to the Worthing Local Plan (2023) as well as more recent policy and guidance set out in the NPPF and Planning Practice Guidance, not the Adur Local Plan which does not apply to this area or the superseded Worthing Core Strategy. Although we support the presumption of using the Built Up Area Boundary of Worthing for the area of search we would have expected the more recent national guidance to be followed set out in Paragraph 027a which recommends the specific area of a town where the proposal is located be used.

It is unclear what sources of information have been used to identify alternative sites. The proposal is for 1 dwelling. We would therefore expect consideration be given as to whether the proposed development could be accommodated within potential sites within the Worthing Strategic Housing Land Availability Assessment and a consideration of sites available on the open market. The Worthing Five Year Housing Land Supply as at 1st April 2024 may also be useful in identifying potential alternative sites. For all sites a consideration of fluvial, tidal and surface water flood risk should be considered. The Council's published sequential test methodology provides recommendations on flood risk ranking and the latest mapping set out in the Flood Map for Planning should be used.

Summary

The site is at a high risk of surface water flooding. On the basis that the submitted Flood Risk Assessment has not demonstrated that the development would be safe from surface water flooding throughout its lifetime and not increase flood risk elsewhere, the sequential test is required.

This should demonstrate that there are no available sites suitable for the proposed development at lower flood risk, considering all sources of flooding.

We do not consider that the submitted sequential test has been undertaken in accordance with national guidance in terms of the consideration of all sources of flooding, justifying an appropriate search area or the identification and ranking of alternative sites.

However should an acceptable Flood Risk Assessment be submitted, as the site is affected by surface water flooding only, then the sequential test will no longer be required.