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/2023/125223/01
Your ref: NOTICE/0007/23

Date: 24 July 2023

Dear Planning team (FAO: Jo Morin),

APPLICATION FOR PERMITTED DEVELOPMENT FOR PRIOR APPROVAL FOR CHANGE OF USE FROM CLASS E AT FIRST, SECOND, THIRD AND FOURTH FLOORS TO 16 NO. 1 BED DWELLINGS (CLASS C3).

PREMIUM HOUSE, THE ESPLANADE, WORTHING, WEST SUSSEX, BN11 2BJ.

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 prior approval 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 take the impacts of climate change into account as there is no assessment of the impact of climate change using appropriate 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.

Specific climate change allowances have not been given by the applicant within the FRA. Appropriate data (a 'Product 4' – please see information below) should be used alongside finished floor levels of the building to demonstrate that the residential parts of the building will not be affected by floods in these scenarios.

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

Product 4 data

Our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email SSDEnquiries@environment-agency.gov.uk to make a request for 'Product 4' data* which will be provided at no charge When making your request please include a location map.

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.

**Product 4 data includes a Detailed Flood Risk Assessment Map, including flood zones, defences and storage areas, areas benefiting from defences, statutory main river designations, historic flood event outlines and more detailed information from our computer river models (including model extent, information on one or more specific points, flood levels, flood flows).*

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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