

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

Our ref: HA/2026/127394/01
Your ref: AWDM/1386/25
Date: 22 January 2026

Dear Planning team (FAO: Rebekah Hincke),

REDEVELOPMENT INCLUDING CHANGE OF USE, ALTERATIONS AND EXTENSIONS TO ACCOMMODATE COMMERCIAL FLOORSPACE (USE CLASS E) AT GROUND FLOOR, AND 9NO. RESIDENTIAL FLATS ACROSS GROUND, FIRST, SECOND AND THIRD FLOORS INCLUDING RETROSPECTIVE CONSENT FOR DEMOLITION OF PART OF THE EXISTING BUILDING AND EXISTING REAR STORAGE BUILDING.

40 - 42 SOUTH STREET, WORTHING, WEST SUSSEX.

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 a range of flooding events (including extreme events) will affect people and property.
- Take the impacts of climate change into account:
 - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resistant to the flood levels for the 0.5% AEP

(2115) tidal design flood event. Consequently, the development proposes inadequate raised finished floor levels.

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.

Since 2020, the Environment Agency has updated our national guidance regarding allowances for freeboard. We now recommend floor levels are set at least 600 millimetres (mm) above the estimated flood level. The design flood level for areas at risk of tidal inundation, should be a 1 in 200 annual probability event plus an allowance for climate change.

We would also note that our previous response in April 2020 regarding this address, advised that finished floor levels shall be set no lower than 13.50mAOD in accordance with the submitted Flood Risk Assessment. Additionally, in April 2022, when reconsulted on the proposals to vary Condition 1 (Approved Plans), we maintained this position. We would appreciate explanation as to why this level has varied significantly between this application, and the previous applications in 2020 and 2022.

Please reconsult us on any revised FRA and we will respond within 21 days of receiving it.

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

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