**ECE Planning**
64 – 68 Brighton Road, Worthing
West Sussex, BN11 2EN

**Shaping places.**
**Unlocking potential.**

| | | | |
|---|---|---|---|
| **Client** | Geneva Investment Group Ltd | | |
| **Project** | 40-42 South Street, Worthing | | |
| **Document** | Sequential Test | **Revision** | Rev |
| **Date** | 25 March 2026 | | |
| **Author** | R Hoad | **Checked** | H James |

# Introduction

This Sequential Test Assessment has been prepared in support of the application for the redevelopment of 40-42 South Street in Worthing. The application has been submitted under reference AWDM/1386/25 and comprises the:

> *"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".*

This assessment has been prepared on the insistence of Worthing Borough Council and their external consultee, WSP.

# The Site

The Site is located in Worthing Town Centre and has an area of approximately 0.04 ha. As illustrated in the accompanying Location Plan, the site is situated on the east side of South Street and backs onto Marine Place; these roads are connected by a pedestrian alleyway adjacent to the south of the site.

As set out within the accompanying Technical Note prepared by Motion, the Environment Agency's (EA's) Flood Map for Planning shows that part of the site is within Flood Zone 3 (High Risk), Flood Zone 2 (Medium Risk) and Flood Zone 1 (Low Risk).

The supporting Technical Note from Motion demonstrates that in terms of this site and proposed development, a Sequential Test is not required in accordance with the Planning Practice Guidance (PPG).

The proposed development falls within Flood Zones 2 and 3 and as such, the LPA have suggested that a sequential test is necessary. It should however be noted that Paragraphs 175 and 176 of the NPPF states that:

> *"175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).*
>
> *176. Applications for some minor development and changes of use62 should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63."*

As confirmed in the accompanying Technical Note prepared by Motion, *"the requirements of Paragraph 175, 176 and 27 of the NPPF have been comprehensively achieved and demonstrate that the Sequential Test is not applicable to the development. Notwithstanding that the NPPF does not require a Sequential*

*Test, one has been carried out by ECE Planning and this has been submitted to the LPA separately to this Technical Note."*

## Sequential Test

As set out in detail within our accompanying Planning Statement, the site is located in Worthing Town Centre, and comprises previously developed land.

The site has previous planning permission (under reference AWDM/0297/20) for the "*Redevelopment including conversion, alterations, extensions and demolition of part of the existing building and existing rear storage building to accommodate 209sqm of existing retail space (A1 use class) at ground floor and 9 no. residential flats across ground, first, second and third floors."*

The current proposals pass the Sequential Test in regard to the above as there is no other suitable site for this development. The land has already been considered suitable for development and there are many neighbouring sites which also benefit from planning consent, and which did not need to undergo a Sequential Test.

Nevertheless, we have reviewed alternative sites as set out below. The review has been carried out to understand if there are any available sites for development within the town centre district of Worthing and that fall within the Town Centre boundary.

The following map shows the relevant Town Centre boundary with the Flood Maps overlaid, and includes reference to the Local Plan's allocated sites in pink.

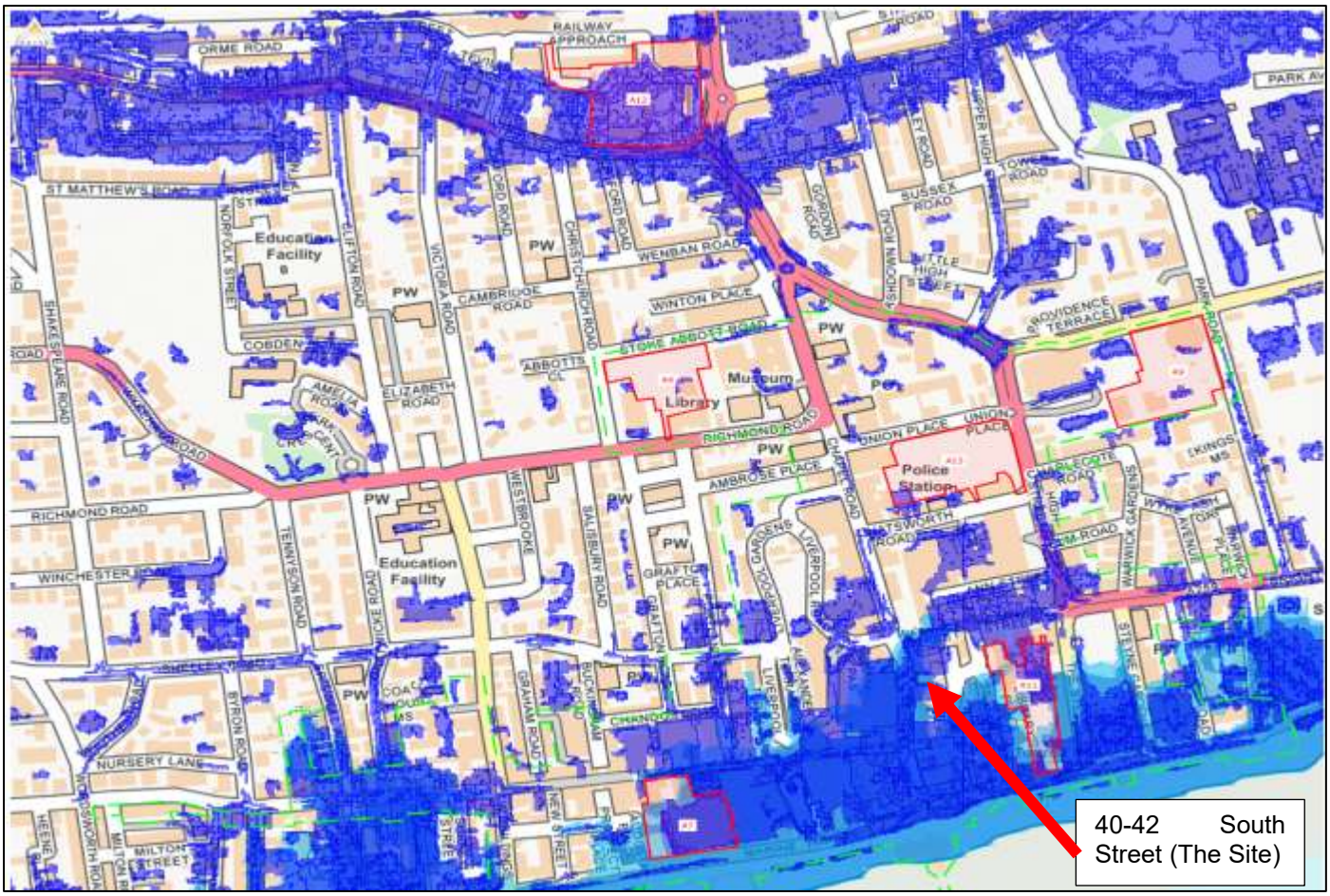



**Figure 1 - Strategic Site Allocation Review Map (All Sources Flooding)**

The Local Plan allocated sites noted in the Map are set out below:

- A4 – Civic Centre, Stock Abbott Road – Neither suitable nor available for a mixed use site containing 9no. flats and commercial.
- A7 – Grafton Site - Neither suitable nor available for a mixed use site containing 9no. flats and commercial.
- A9 – Lyndhurst Road- Neither suitable nor available for a mixed use site containing 9no. flats and commercial.
- A11 – Stagecoach Bus Depot - Neither suitable nor available for a mixed use site containing 9no. flats and commercial.
- A12 – Teville Gate - Neither suitable nor available for a mixed use site containing 9no. flats and commercial.
- A13 – Union Place - Neither suitable nor available for a mixed use site containing 9no. flats and commercial.

As demonstrated in Figure 1, much of Worthing falls within a Flood Zone when considering the 1 in 1,000 year flood event. This would affect a number of allocated sites, rendering sites such as A7 (Grafton Site) and A11 (Stagecoach Bus Depot) as undevelopable, if the same approach being taken on the proposed site was used for allocated sites.

In addition to the above, it should be noted that there are a number of windfall sites located in and outside of the flood zones but are not necessarily suitable or available.

It is clear that there are not any alternative sites which could be considered to be suitable for accommodating 9no. new flats and commercial space in the Town Centre boundary. In this regard, Worthing's Flood Risk Sequential & Exceptions Test document dated January 2021 is important and states that:

> *"2.2 Windfall Sites 2.2.1 The Submission Draft Local Plan housing target includes a reliance on windfall sites to deliver 871 homes. Windfall sites are defined in the revised NPPF Glossary as: "Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available."*
>
> *2.2.2 It is recommended that the acceptability of windfall applications in flood risk areas should be considered at the strategic level through a policy approach. In the absence of a flood risk windfall policy, it may be possible (where the data is sufficiently robust) for the LPA to apply the Sequential Test taking into account reasonably available sites, historic windfall rates and their distribution relative to Flood Zones.*
>
> *2.2.3 Given the limited land availability in Worthing the Local Plan is unable to meet the local housing need. It is therefore considered that all potential windfall sites will need to be developed (where acceptable in terms of planning policy) to further contribute to meeting this need as far as possible. Individual sites not allocated through the Local Plan will be required to undertake the Sequential Test, and where necessary the Exception Test at the planning application stage. This should consider the Flood Zones and other sources of flooding. However, given the scale of unmet need it is unlikely to be possible for development to be directed to areas of lower flood risk."*

## Exception Test

Diagram 3 as set out in Figure 2 illustrates the application of the Exception Test. The Sequential Test above confirms that there are no reasonably available or suitable alternative sites, and the site therefore passes this stage.

Furthermore, the proposed development can be made safe for its lifetime without increasing flood risk elsewhere, satisfying the second limb of the Exception Test.

Accordingly, the development is considered acceptable in flood risk terms and may be considered for planning permission. The provision of 9 new residential units alongside an existing, functioning café represents a clear planning benefit, which significantly outweighs any residual flood risk concerns.

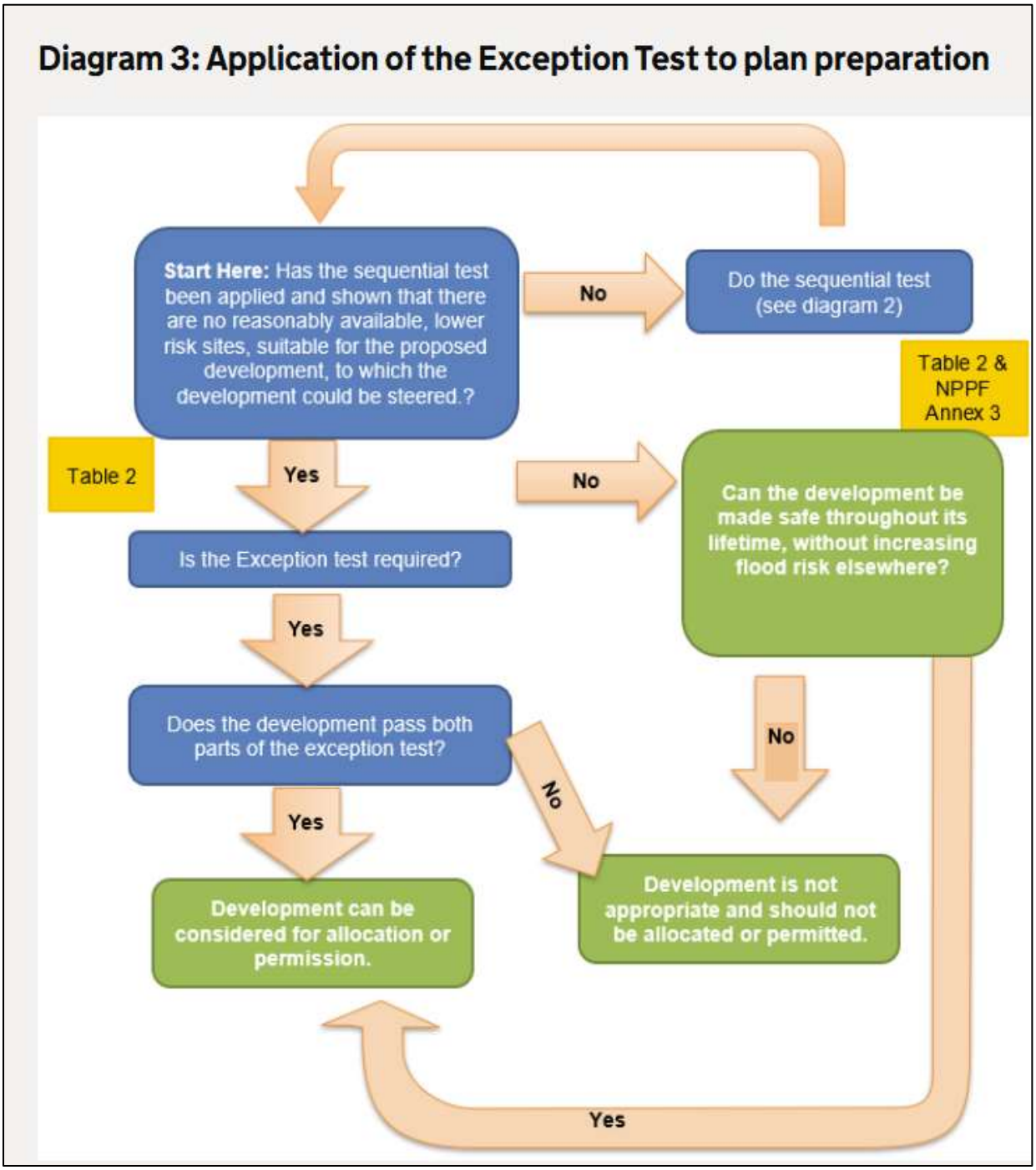



Figure 2 - Diagram 3 of the PPG - Paragraph: 033 Reference ID: 7-033-20220825

## Conclusion

The site passes the Sequential Test at Steps 1 and 2 (set out above) as the development site simply cannot be located elsewhere.

In line with clear guidance from the PPG as set out in the diagram presented at Figure 2, it is clear that the site is acceptable for development and that no alternative sites which are located in the Town Centre boundary are suitable or available.

It is important to note that if the 1 in 1,000 year flood event is used which the proposed development site is being assessed against, then most of Worthing is inappropriate for development, or at least no more appropriate than the 40-42 South Street site. As such, the Sequential Test is satisfied and a proactive approach needs to be taken when considering this application.

As above, the site clearly passes the Exception Test also.

As such, we would suggest that the site should be viewed favourably for development, and read in conjunction with the Flood Risk Assessment and Drainage Strategy prepared by Motion to understand the proposed flood mitigation measures.