

Adur & Worthing Councils - Development
Control
Richmond Road, Worthing, BN11 1LF

Reference: PA-0006691/01
Customer reference: AWD/0626/26
06 July 2026

Demolition of existing chalet bungalow and erection of a three storey house.

54 Old Fort Road, Shoreham-by-sea, West Sussex, BN43 5RJ.

Dear Planning Officer,

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 adequate 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 whether the development will increase flood risk elsewhere. 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 - 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.

A site-specific 'Product 4' data pack should be obtained from us (see the 'Advice to the Applicant' section below). The modelled design flood level (with appropriate climate change allowances) should be compared to the proposed finished floor level of the development.

Please reconsult us if a revised FRA is submitted and we will respond within 21 days of reconsultation.

Advice to the Applicant

FRA sources of information

We do not prepare or provide FRAs, however, relevant flood risk data can be ordered via our [Flood Map for Planning page](#) or our Customers and Engagement teams 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 (there is no charge for this data).

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: [Flood risk and coastal change - GOV.UK](#).

Environmental permit – Flood risk activities

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work

- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

If you have any questions regarding our response, please contact planningssd@environment-agency.gov.uk.

Yours sincerely,

Anna Rabone, Sustainable Places Technical Specialist MRTPI
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planningssd@environment-agency.gov.uk
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