

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

Our ref: HA/2025/126677/01
Your ref: AWDM/0448/25

Date: 16 April 2025

Dear Planning team (FAO: Hannah Barker),

**REDUCTION OF THE EXISTING SINGLE STOREY REAR EXTENSION;
CONSTRUCTION OF TWO STOREY SIDE EXTENSION OVER EXISTING GARAGE,
AND CONVERSION OF PROPERTY INTO 2NO. 2 BED FLATS**

1 OLD SHOREHAM ROAD, SHOREHAM-BY-SEA, WEST SUSSEX, BN43 5TA.

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

We object to this application and recommend that planning permission is refused. There are two grounds for our objection as set out below:

- The proposed development is located in Flood Zone 3. The separation of the property into two distinct flats, one confined to the ground floor, means that there is no safe refuge for any ground floor bedrooms. This means there is an increased risk to life.
- 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 people will be kept safe from the identified flood hazards.
 - Consider how a range of flooding events (including extreme events) will affect people and property.
 - Consider the requirement for flood emergency planning including flood warning

and evacuation of people for a range of flooding events up to and including the extreme event.

- Take the impacts of climate change into account - there is no assessment of the impact of climate change using appropriate climate change allowances.

Overcoming our objection

To overcome this objection, the applicant will need to address the points raised above and submit a revised FRA. If this cannot be achieved, we are likely to maintain our objection.

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

Advice to the Local Planning Authority

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Advice to the Applicant

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact email SSDEnquiries@environment-agency.gov.uk to request 'Product 4' data. Please include a location map when making a request. 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>.

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