

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

Reference: PA-0004207/01
Customer reference: AWD/0511/26
26 May 2026

The construction of a flood barrier to allow for the use of the lower ground floor of 51A Old Fort Road as a flexible habitable living space to include sleeping.

51A Old Fort Road, Shoreham-by-Sea, BN43 5RL.

Dear Planning Officer,

Thank you for consulting the Environment Agency on the above application.

Please find our position and comments set out below.

Environment Agency position

As this development poses an unacceptable risk to life from flooding, we **object** to this application and recommend that planning permission is refused.

Reasons

The site lies within Flood Zones 2 and 3a, which is land defined by the planning practice guidance as having a medium and high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and/or property from tidal inundation would be unacceptable if the development were to be permitted.

The application does not demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. It is not considered appropriate to support sleeping accommodation where reliance is placed on a flood defence. Assessments of flood risk should be undertaken on the basis of the undefended scenario. While this application proposes the introduction of a flood defence, it should not be relied upon in determining the level of flood risk to the site.

Our response to application AWD/2007/21 included a condition specifying that the lower ground floor was not to be used for habitable uses and/or for sleeping accommodation due to flood risk.

Overcoming our objection

To overcome our objection, the applicant should submit evidence to demonstrate that the proposed development will not pose a risk to life as highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us if a revised Flood Risk Assessment is submitted and we will respond within 21 days of re-consultation.

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

Yours sincerely,

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