creating a better place
for people and wildlife

Environment Agency

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

**Our ref:** HA/2025/127201/01
**Your ref:** AWDM/1246/25

**Date:** 14 November 2025

Dear Planning team (FAO: Marie O'Keeffe),

**EXISTING FIRST FLOOR TIMBER BALCONY TO BE REPLACED AND ENLARGED ALONG WITH THE ADDITION OF A NEW STAIRCASE PROVIDING ACCESS TO THE GARDEN. SINGLE STOREY FRONTAGE OUTBUILDING TO INCLUDE GARDEN ROOM, SHOWER ROOM AND STORAGE. SWIMMING POOL, SAUNA BUILDING AND OUTDOOR KITCHEN, GARDEN STORAGE BUILDING AND BIN STORE. FENESTRATION ALTERATIONS AND NEW ZINC ROOF WITH ROOFLIGHTS.**

**154 OLD FORT ROAD, SHOREHAM-BY-SEA, WEST SUSSEX, BN43 5HL.**

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.

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.

  We note that there is an increase in risk with the proposed garage conversion creating a further bedroom (Proposed Ground and First Floor plan, ref 0750.PL.002).

  We also require clarification of the intended use of the muti-use Garden Room as from the submitted plan (Sauna, Garden Storage, Bin Store & Garden Room

Plans & Elevations, document ref: 0750.PL.005A) this is shown to include sleeping accommodation with ensuite.

- 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'.

Due to the extent of this application, this proposal does not constitute a minor extension and the FRA Standing Advice form submitted is out of date.

**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.

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.*

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

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