

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

Reference: PA-0006691/02
Customer reference: AWD/0626/26
10 August 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 following the submission of a revised Flood Risk Assessment.

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 continue to **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 people will be kept safe from the identified flood hazards, an insufficient freeboard has been used.

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.

The proposed freeboard of 300mm above the design flood level is inadequate. The FRA states that the modelling is high confidence, which is not the case. Wave overtopping is an aspect of coastal modelling which brings increased uncertainty, meaning a 600mm freeboard will be required.

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

Advice to the Applicant

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)

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

Yours sincerely,

Anna Rabone, Sustainable Places Technical Specialist MRTPI

National Contact Centre: 03708 506 506

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