Jackie Fox
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

17 April 2024

Dear Jackie,

RE: **AWDM/0429/24 - 33 Oxford Road Worthing West Sussex.**

Thank you for your consultation on the above site. We have reviewed the application as the drainage consultant acting on behalf of the Council and wish to make the following comments.

The applicant is applying for the retrospective change of use of ground floor from Class E (shop/office) to 1no. residential dwelling (Class C3) with associated changes to replacement doors and windows to north elevation.

Following a review of the submitted information, we have noted the following issues that prevent the approval of the application:

I. **Safe access and egress** – As stated in paragraph 44 of the Planning Practice Guide (PPG) for flood risk and coastal change, 'if the probability of inundation is high, safe access and escape should be maintained for the lifetime of the development'. Furthermore, paragraph 47 of the PPG states 'Wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen hazards and contaminants in floodwater, or the risk that people remaining may require medical attention)'. Currently, it is suggested that the residents of the proposed property will remain inside the building in the event of a flood, with the property providing safe refuge, however this is not acceptable as it does not provide a safe access route away from the property.
II. **Evacuation plan** – The currently provided evacuation plan is insufficient. The applicant should provide maps that demonstrate the evacuation route residents should take in the

Matrix House
Basing View
Basingstoke, Hampshire
RG21 4FF
Tel: +44 1256 318 800
wsp.com

WSP UK Limited | Registered address: WSP House, 70 Chancery Lane, London WC2A 1AF
Registered in England and Wales No. 01383511

event of a flood. As stated in paragraph 47 of the PPG, evacuation routes should avoid flow paths and be above design flood levels.

III. **Flood depths** – As detailed in the submitted Flood Risk Assessment, the proposed development is at risk of flooding up to depths of 1.2m, which is extremely dangerous and poses a threat to life.

IV. **Resistance and resilience** – Further resistance and resilience measures should be utilised to demonstrate that the change of use is safe for its lifetime. Currently flood gates/doors are utilised, however these are only effective for flood depths of up to 0.6m, meaning it is insufficient for the level of risk posed to the site.

We would recommend the objection of the application on the above grounds.

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraphs 165-175 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Yours sincerely,

Louise Tedridge
Sustainable Water Management Officer