



Finlay Gardner
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

25 June 2026

Dear Finlay,

RE: NOTICE/0008/26 - 25 - 27 Montague Street Worthing West Sussex BN11 3BE.

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 prior approval for proposed change of use of the first to third floors from commercial use (Use Class E) to 4No. residential flats (Use Class C3). The application is to Worthing Borough Council.

Following a review of the submitted information, we have concerns regarding safe access and egress to the proposed development. We note that safe access has been discussed within the submitted FRA (Rev: 1306, Ref: A, dated April 2026); however, it has been assumed flood risk depths on Montague Street and Bath Place are 300mm. The Environment Agency's Flood Map for Planning demonstrates that surface water flood depths on these roads are between 300mm and 600mm during the 1 in 100-year plus climate change event. As stated in paragraph 47 of the PPG, "even low levels of flooding can pose a risk to people" so "wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths".

Therefore, insufficient information has been provided to demonstrate the application is in accordance with the NPPF and its accompanying PPG and **we are not able to recommend the approval of the application.**

Yours sincerely,

Sustainable Water Management Officer