



Jo Morin
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

16 March 2026

Dear Jo,

RE: AWDM/0009/26 - Thatch Cottage Pond Lane 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 subdivision of existing dwelling plot to provide 2no. 2-storey, semi-detached house to west side garden, repair of fire damaged Listed building (including reinstatement of thatch roof), enlargement of existing car parking to east side accessed off Pond Lane to provide shared parking area with bin/cycle store. The application is to Worthing Borough Council.

Following a review of the submitted information, we have noted that **insufficient information has been provided to demonstrate that the development is in accordance with the NPPF, PPG and Adur and Worthing Local Planning Policies.**

Sequential Test – The sequential test has not been correctly applied. As stated in paragraph 172 of the NPPF, “*all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property*”. Therefore, the sequential test should be applied to demonstrate that there are no other suitable sites at a lower risk of surface water flooding.

Flood Risk and Depths: The proposed site has a high surface water flood risk and is located within a major surface water flow path. There is a high risk of >90cm flood depths across majority of the site which is considered unsafe and could pose a threat to life due to the type of development proposed. The FRA shows that neither the existing dwelling or proposed dwellings can be protected from flood risk. The FRA recommends a resilient design which allows the dwellings to flood. This is not acceptable and poses significant risk to the future occupiers. The FRA mentions Environment Agency Flood Warnings, but these are only applicable to fluvial flooding and will not provide the future occupiers with any warning of surface water flood risk.

Increase in Flood Risk: Water displacement as a result of the development will increase flood risk to the site and elsewhere, which is not acceptable. The hydraulic modelling shows increasing flood depths within and outside the site boundaries due to the development. There is also no clear assessment of the impact the proposed development will have on the surface water flow path.

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, seeking refuge on the upper floor, however this is not acceptable as it does not provide a safe access route away from the property. Therefore, safe access and egress has not been demonstrated.

Surface Water Drainage: The proposed drainage strategy has not followed the hierarchy of preference as infiltration has not been considered. Winter infiltration testing and winter groundwater monitoring should be provided to demonstrate that infiltration is not a viable option for surface water discharge.

Based on the above, **we would recommend the application is not approved until updated information is received that addresses the above points.**

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

Sustainable Water Management Officer