



Louise Prew
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

4 February 2026

Dear Louise,

RE: AWDM/1321/25 - 8 - 9 Arcade Buildings South Street 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 change of use of first and second floor from food sales onsite (Class Eb) to two residential units (Use Class C3 with reconfiguration of shop front, window replacement to front elevation, window replacement and creation of new windows to rear elevation and rooftop photovoltaic panels. The application is to Worthing Borough Council.

Following a review of the submitted information, we acknowledge the receipt of a Flood Risk Assessment (AEG9895_BN11_Worthing_01, Issue 2, dated 28/01/2026); however, we note that this has provided insufficient information to demonstrate the proposed development is in accordance with the NPPF and its accompanying PPG. We have serious concerns over safe access and egress to and from the proposed development.

Safe Access: We note that the applicant has proposed evacuation upon receipt of Environment Agency flood alerts and warnings; however, these warnings are not provided in advance of surface water flooding due to the rapid onset of surface water flooding. As stated in paragraph 44 of the 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)”*. Page 23 of the submitted FRA demonstrates that the site is surrounded by a high risk of surface water flooding up to depths of 30cm. Flood depths above 25cm are considered dangerous and unsafe to escape through.

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



Therefore, the applicant has not demonstrated safe access, in terms of surface water flooding, for the proposed development and we are unable to remove our objection.

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