Rebekah Hincke
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

14 April 2026

Dear Rebekah,

RE: **AWDM/1386/25 - 40 - 42 South Street Worthing West Sussex BN11 3AA.**

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 redevelopment including change of use, alterations and extensions to accommodate commercial floorspace (Use Class E) at ground floor, and 9no. residential flats across ground, first, second and third floors including retrospective consent for demolition of part of the existing building and existing rear storage building. The application is to Worthing Borough Council.

Following a review of the updated information, we acknowledge the receipt of Technical Note 02, dated 23rd March 2026, and ECE Planning Sequential Test, dated 25th March 2026. We are happy that the submitted Technical Note 02 demonstrates that the section of the proposed redevelopment is outside of the surface water flood risk and therefore the sequential test is not required. We note that the Environment Agency have reviewed the application and recommended a condition relating to finished floor levels. We agree with the wording of this condition and the finished floor levels would be sufficient to remove the risk of internal surface water flooding. The applicant has also demonstrated that safe access and egress is available, in terms of surface water, via Marine Place.

We note that drainage information has not been provided at this stage and therefore we would recommend the below conditions. We would not expect new drainage to be included for the existing building; however, drainage will need to be provided for the proposed redevelopment at the rear of the site. In addition, any betterment in terms of discharge rates for the existing building would also be welcomed.

Therefore, **we would recommend the approval of the application with the following conditions and informative attached**:

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Condition 1: Construction shall not begin until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must prioritise the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and demonstrate no increase in flood risk as a result of the Proposed Development with sufficient supporting evidence provided to support its viability including supporting calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100) plus climate change critical storms. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring and winter infiltration testing to BRE DG365, or similar approved, will be required to support the design of any infiltration drainage. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of Adur & Worthing Council.

Condition 2: The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

I. a timetable for its implementation.
II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
III. a management and maintenance plan for the lifetime of the development which shall include details of design life and the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Adur and Worthing Council.

Informative 1: We have identified the site is adjacent to a surface water flood risk, therefore appropriate flood resistance and resilience measures should be considered within the development.

Yours sincerely,

Sustainable Water Management Officer