



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

25 April 2025

Dear Jo,

RE: AWDM/0168/25 - 9 Station Parade Tarring 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 a proposed single-storey 1-bedroom dwelling unit attached to rear (south) elevation of No.9. 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 the application is in accordance with the NPPF. We would recommend the application is not approved for the following reasons:

- I. **Sequential Test** – The Sequential Test has not been correctly applied. As stated in paragraph 172 of the National Planning Policy Framework (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 applicant must demonstrate that there is no other site available with a lower flood risk.
- II. **Safe Access and Egress** – The applicant has not demonstrated that safe access and egress can be achieved for the proposed development. As stated in paragraph 44 of the Planning Practise Guidance (PPG) “*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 that “*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)*”.



III. **Drainage** – The applicant has provided drainage details proposing the use of a soakaway and permeable paving. However, no infiltration testing or groundwater monitoring has been provided to support the viability of the drainage design.

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