



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

14 January 2026

Dear Finlay,

**RE: AWDM/1452/25 - Site At 101 And 103 Newland 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 change of use of ground floor office and storage (Use Class Eg) to residential flat (Use Class C3). Demolition of existing rear extensions and erection of single storey rear extension. Alterations to front elevation to remove shopfront and replace with door and windows. Alteration of rear doors of existing ground floor flat. The application is to Worthing Borough Council.

Following a review of the submitted information, we note that insufficient information has been provided to demonstrate the application is in accordance with the National Planning Policy Framework (NPPF) and its accompanying Planning Practise Guidance (PPG). We have concerns regarding the following:

**Surface Water Flood Risk:** We have identified the site is located within an area of surface water flood risk and within a wider surface water flow path. A Flood Risk Assessment (FRA) should be submitted to demonstrate that the proposed development will be safe for the lifetime of the development. Safe access and egress should also be demonstrated.

**Resistance and Resilience Measures:** Due to the surface water flood risk at the site, appropriate flood resistance and resilience measures should be considered within the development and detailed in the FRA.

**Surface Water Drainage:** It is noted that the extension replacement is proposed to be drained via a soakaway. However, insufficient information has been received to demonstrate that this is a suitable method of drainage and will not increase flood risk to the site and elsewhere. Infiltration testing and groundwater monitoring is required to demonstrate that infiltration is a viable method of discharge. A drainage plan and calculations are required to demonstrate that the proposed soakaway is sized

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correctly and will not increase flood risk. We note that this can be conditioned and provided at detailed design, once an FRA has been received addressing the above concerns.

**We would recommend the application is not approved until a Flood Risk Assessment is received addressing the above comments.**

**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