



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

18 August 2025

Dear Louise,

RE: NOTICE/0012/25 - Shop 131 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 prior approval for proposed change of use of the ground floor from Class E (commercial/business/service) to provide additional floorspace for first floor flat (Use Class C3). The application is to Worthing Borough Council.

Following a review of the updated 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 Policy Guidance (PPG).

The applicant has not demonstrated that safe access and egress can be achieved for the proposed development. As stated in paragraph 44 of the 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)*”. In addition, safe refuge, as recommended by the applicant, is not acceptable.

Surface water flooding typically occurs with little advance notice and develops rapidly; therefore, **we would recommend the application is not approved** until an emergency plan is received demonstrating safe access and egress routes for the proposed development.



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