



Jackie Fox  
Adur & Worthing Councils  
Portland House,  
Richmond Road,  
Worthing,  
BN11 1LF

1 May 2025

Dear Jackie,

**RE: AWDM/0524/25 - 11 Montague Place Worthing West Sussex BN11 3BG**

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 part ground floor and upper floors from commercial (Class E) to four self-contained residential units (Use Class C3) with shopfront alteration. The application is to Worthing Borough Council.

Following a review of the submitted information, we have noted that insufficient information has been provided within the Flood Risk Assessment to demonstrate the application is in accordance with the NPPF and its accompanying PPG. The provided FRA only considers present day surface water flood risk and does not demonstrate safe access and egress. As stated in Paragraph 5 of the PPG, residents and users must be able “*to safely access and exit a building during a design flood*”. Therefore, the applicant must consider flood risk to the proposed development, and demonstrate safe access and egress, during the 1 in 100-year storm event with an 45% allowance for climate change.

**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

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