



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

25 September 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 concerns over whether the proposed development will be safe for the lifetime of the development, from a surface water flood risk perspective. Currently, the site is at a medium surface water flood risk, with access proposed through an area of high surface water flood risk. The applicant has provided further mapping to show that the site is at low risk (between 0.1% and 1% chance each year) of 20cm flood depths for the present day and 'climate change' (2040-2060) scenarios. However, the climate change scenario provided by the Environment Agency is insufficient as it does not demonstrate that the development will be safe for the lifetime of the development (100 years) and that safe access and egress will be available for the lifetime of the development. Without appropriate surface water modelling, we are concerned that safe access and egress will not be possible as flood risk is likely to increase over the lifetime of the development. Furthermore, flood risk to the building may worsen, creating a significant risk to the proposed ground floor flat.

We would recommend the application is not approved as insufficient information has been provided to demonstrate the proposed development is in accordance with the NPPF and its accompanying PPG.

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