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Development Management  
Adur & Worthing Councils  
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BN11 1HA

**Lead Local Flood Authority  
Ground Floor  
Northleigh  
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Chichester  
West Sussex  
PO19 1RH**

Date 10 September 2026

Planning Reference: **AWDM/0396/26**

Site Address: **10 - 20 Marine Place Worthing West Sussex BN11 3DN**

Planning Description: **Demolition of existing buildings and construction of a three-storey building comprising 27 1-bed apartments, secure cycle and bin storage, and hard and soft landscaping and associated works**

Dear Louise

Thank you for your consultation on the above site. For this consultation, we have reviewed the following documents submitted:

- Flood Risk and Drainage Assessment, prepared by EAS Ltd, dated March 2026, Ref: 883/MMEPlanning/MarinePlace/Flood&Drainage

The LLFA is concerned with the proposed development as it is unclear how it will impact surface water flood risk elsewhere. The EAs Flood Map for Planning shows the site being at risk of surface water flood risk in the 1 in 100 plus climate change event. The proposed building is located within this area of flood risk. The FRA does not adequately assess the impact the development will have through displacing flood water at the site. Further detail on the proposed drainage strategy is also required.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- the development adversely impacting flood risk elsewhere.
- the development not complying with NPPF, PPG or local policies.

### **Reason**

To prevent flooding in accordance with National Planning Policy Framework Section 18: Policies F7, F8, N2(1e), 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.

**We will consider reviewing this objection if the following issues are adequately addressed.**

1. A detailed assessment of the potential loss of surface water flood storage and how this will impact the proposed development and the surrounding area should be prepared and submitted.
2. Full calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100) plus climate change critical storms are required. Calculations should use FEH rainfall data, a CV value of 1, and an allowance for climate change.
3. Detailed plans of the proposed surface water drainage strategy are required.

Yours sincerely

**Flood Risk Management Team**

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