Louise Prew
Development Management
Adur & Worthing Councils
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

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

Date 08 October 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 September 2026, Ref: 883/MMEPlanning/MarinePlace/Flood&Drainage

The LLFA Last responded to this application on 10 September 2026 stating three points of objection relating to the potential displacement of surface water flooding and a lack of detail relating to the proposed surface water drainage strategy. Since this response, an updated Flood Risk and Drainage Assessment has been provided to address our concerns.

The LLFA remains concerned with the proposed development as it is unclear how it will impact surface water flood risk elsewhere. We appreciate that the existing site is entirely impermeable and with the introduction of a suitable surface water drainage strategy, there will be no increase in runoff but we are concerned by the loss in surface water flood storage. The Environment Agency's 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.

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.

Yours sincerely

Flood Risk Management Team