



Jo Morin  
Adur & Worthing Councils  
Portland House,  
Richmond Road,  
Worthing,  
BN11 1LF

1 August 2025

Dear Jo,

**RE: AWDM/0954/25 – Marine View 111 Marine Parade 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 the change of use from guest house (Class C1) to large house in multiple occupation (Sui Generis). The application is to Worthing Borough Council.

Following a review of the submitted 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 most up-to-date publicly available modelling from the Environment Agency (EA) shows that the site is subject to a high surface water flood risk. As the change of use introduces permanent occupancy, the vulnerability of the site will be increased. It must be demonstrated that a safe access and egress route can be achieved during the design event. Surface water flooding is unpredictable and therefore the reliance on the EA Floodline Alert and Warnings Direct service and safe refuge is insufficient.

**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,

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Sustainable Water Management Officer