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

6 January 2026

Dear Jo,

RE: **AWDM/1322/25 -17 Franklin Road Worthing West Sussex BN13 2PG.**

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 development of a detached bungalow in the rear garden with access drive from Franklin Road. The application is to Worthing Borough Council.

Following a review of the updated Sequential Test, we note that a document has been submitted, assessing other available sites regarding fluvial/tidal flood zones/risk but the test does not consider surface water. As stated in paragraph 172 of the NPPF and our initial response dated 31st October 2025, "*all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property*". Therefore, the sequential test should be applied to demonstrate there are no other suitable sites at a lower risk of surface water flooding.

We suggest the Local Planning Authority review the Sequential Test in terms of surface water.

Yours sincerely,

Sustainable Water Management Officer

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