



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

1 August 2025

Dear Jo,

**RE: AWDM/0168/25 - 9 Station Parade Tarring Road Worthing West Sussex BN11 4SS.**

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 proposed single-storey 1-bedroom dwelling unit attached to rear (south) elevation of No.9. 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 Practice Guidance (PPG). The application is also not in accordance with Policy DM20 of Worthing Borough Councils Local Plan (2020-2036).

**We would therefore recommend the application is not approved** for the following reasons:

**Flood Risk:** The proposed site has a high surface water flood risk in both the present day and climate change scenarios. The site is inundated with flood water in the 3.33% AEP, 1% AEP, and 0.1% AEP storms.

**Sequential Test:** The sequential test has not been correctly applied. It does not appear that the applicant has consulted the Local Planning Authority (LPA) to agree a search area, methodology, or a list of sites to test. Furthermore, there are sites stated in Appendix A.1 of the Sequential Test Report (95586-Boys-StationRd ST v1.0 190525, dated May 2025), that are suitable for the proposed development. It is not clear why these sites have been considered unsuitable or unavailable for development. As the proposed development is for one dwelling, the list of sites tested can also include larger sites where the one dwelling could be included within a larger development. As stated in paragraph 172 of the NPPF, “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”.

**Safe Access and Egress:** As stated in paragraph 44 of the PPG for flood risk and coastal change, ‘if the probability of inundation is high, safe access and escape should be maintained for the lifetime of the development’. Furthermore, paragraph 47 of the PPG states ‘Wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen hazards and contaminants in floodwater, or the risk that people remaining may require medical attention)’. Currently, safe access and egress has been demonstrated using the Environment Agency’s risk of flooding from surface water mapping using climate change. This does not demonstrate safe access and egress for the lifetime of the development (100 years with an allowance for climate change) because the mapping only considers climate change between 2040-2060 which is considered insufficient.

**Increase in Flood Risk:** Water displacement as a result of the development will increase flood risk to the site and elsewhere, which is not acceptable. The applicant has not demonstrated that the proposed development will not increase flood risk to the site and elsewhere.

**Drainage:** The proposed drainage strategy has not followed the hierarchy of preference for surface water disposal because infiltration has not been proved unviable. As stated in Chapter 10 of the CIRIA SuDS Manual, ‘a perceived lack of space is not a justifiable reason for not using SuDS’. Winter infiltration testing to BRE DG365 and winter groundwater monitoring is required to demonstrate infiltration is not a feasible option for drainage. Calculations for the proposed drainage strategy should then be provided using FEH data, due to FSR underestimating. Furthermore, the calculations should use a CV value of 1 and a 45% allowance for climate change. If infiltration is viable and a soakaway is proposed, calculations should use the worst-case infiltration rate recorded in testing and only utilise side infiltration (exclude base infiltration) due to the likelihood the base of the soakaway will silt up over time.

### **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