

Planning Application Technical Response

Site:	Car Park Adjacent Sandell House, Railway Approach, Worthing, West Sussex
LPA Reference:	AWDM/1329/25
Date Assessed:	06 January 2026



FULL APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 170, 181 PPG Paragraph 051 SDNSTS S10 Level 2 SFRA (Adur and Worthing)	<p>Provide updated information within an amended FRA on;</p> <p><input type="checkbox"/> Fluvial flooding from the ordinary watercourse.</p> <p><input type="checkbox"/> Surface water flow path originating offsite.</p> <p><input type="checkbox"/> Groundwater flooding.</p> <p><input type="checkbox"/> Rainwater surcharged sewer flooding.</p> <p><input type="checkbox"/> Historic flood information.</p>	
Mitigation not appropriate	NPPF Paragraph 170, 181 and 187 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044 Level 2 SFRA (Adur and Worthing)	<p><input type="checkbox"/> Use sequential approach with the following hierarchy.</p> <ol style="list-style-type: none"> I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed <p><input type="checkbox"/> The proposal increases the risk of flooding to existing infrastructure, dwellings or property. Mitigation should be reassessed to show how flood risk can be reduced overall.</p> <p><input checked="" type="checkbox"/> Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.</p>	<p>Site avoids the risk of flooding – not in an area of surface water flooding / not in Flood Zone 2 / Flood Zone 3.</p> <p>No - Site is at low risk of flooding from all sources.</p> <p>Objection: Although the site is at low risk of flooding, the Flood Risk Constraint Plan (prepared by GTA Civils and Transport dated 11 September 2025 Ref: 13974-1000 Rev: P1) shows high surface water flood risk from the access road. Whilst we note that the development is a car park, we would need to ensure that emergency vehicles</p>

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			could access the site when needed. Further information is required.
Long term sustainability of the development	NPPF Paragraph 181 and 187 PPG Paragraph 004, 036, 061, 068 and 069 Level 2 SFRA (Adur and Worthing)	<input type="checkbox"/> Provide site specific ordinary watercourse or surface water flow path modelling.	Not required – Low flood risk.
		<input type="checkbox"/> Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	Not required – Low flood risk.
		<input type="checkbox"/> Include evidence of appropriate freeboard to finished floor levels from the design flood level.	Included on the drainage drawing.
		<input type="checkbox"/> Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	Not required – Low flood risk.
		<input type="checkbox"/> Use up to date FEH2022 rainfall data for all design flood events.	Not required – Low flood risk.
		<input type="checkbox"/> Provide an easement of 3 m from the top bank of any watercourse is required for maintenance.	Not required – No watercourse with the RLB.
		<input type="checkbox"/> Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see West Sussex LLFA website).	Not required – No watercourse with the RLB.
How does the site currently drain?	NPPF Paragraph 182 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6	<input type="checkbox"/> Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Included – Infiltration testing has been provided in Appendix D.

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	Level 2 SFRA (Adur and Worthing)	<input checked="" type="checkbox"/> Greenfield runoff rates and volumes missing.	Objections: Greenfield Volumes have not been provided. Further information is required.
		<input type="checkbox"/> Greenfield runoff rates need to be recalculated (incorrect input parameters).	Included – FEH Statistical Method has been used.
		<input type="checkbox"/> Pre-development brownfield runoff rates missing.	Included
		<input type="checkbox"/> Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters).	Included
		<input type="checkbox"/> Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	Included
		<input checked="" type="checkbox"/> Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	Objection: Not provided. Further information is required.
Where will the site drain to?	NPPF Paragraph 182 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14	Drainage location hierarchy has not been followed, further information is required on; <input type="checkbox"/> Evidence why rainwater reuse can't be included.	Included – Justification provided as to why not proposed.
	Level 2 SFRA (Adur and Worthing)	<input type="checkbox"/> Interception has not been calculated and/or provided.	Informative: The LLFA cannot locate information on interception. Further information is requested.

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		<input type="checkbox"/> Infiltration proposals – re Groundwater Source Protection Zone I restrictions.	Justification provided as to why infiltration is not viable.
		<input type="checkbox"/> Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	Included – No waterbodies within the vicinity.
		<input checked="" type="checkbox"/> Surface water sewer – no in principle agreement from owner of the asset.	Objection: For discharge into a surface water sewer, we would need to see a pre-development enquiry from Southern Water / engagement which has not been provided at this stage. Further information is required.
		<input type="checkbox"/> Combined sewer – no in principle agreement from owner of the asset.	Included – Not proposed.
		<input type="checkbox"/> Full impact assessment of failure and emergency procedures required if a pump is part of the design.	Included – Not proposed.
		<input type="checkbox"/> Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	Included – Not proposed.
		<input type="checkbox"/> In principle objection - proposing to connect surface water runoff to foul sewer.	Included – Not proposed.
		<input type="checkbox"/> Detailed justification required why the application cannot be drained via gravity and a pump is required.	Included – Not proposed.

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Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 182 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063 Level 2 SFRA (Adur and Worthing)	<input checked="" type="checkbox"/> The application must provide water quantity benefits in open, at the surface or above ground SuDS.	Objection: The proposals do not include any information on above ground SuDS. We would need further justification as to why these cannot be included. Further information is required.
		<input checked="" type="checkbox"/> The application must provide water quality benefits.	Objection: Simple Index Approach seems very light touch. Further information is required.
		<input checked="" type="checkbox"/> Appropriate water quality assessment is absent / incorrect.	Objection: Simple Index Approach seems very light touch. Further information is required.
		<input type="checkbox"/> Additional water quality treatment using surface SuDS is required due to the sensitivity of the discharge location (including groundwater, designated surface watercourses or deep infiltration features).	Not required – Not a sensitive discharge location.
		<input type="checkbox"/> The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Informative: Further information is required on biodiversity.
		<input type="checkbox"/> The application must provide amenity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Informative: Further information is required on amenity.
		<input type="checkbox"/> The most precautionary infiltration rate should be used in the design of the attenuation feature.	Justification provided as to why infiltration is not viable.
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 181, 182 SDNSTS S2, S3, S4, S5, S6 Level 2 SFRA (Adur and Worthing)	<input type="checkbox"/> Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	Justification provided as to why infiltration is not viable.

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		<input type="checkbox"/> Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	Justification provided as to why infiltration is not viable.
		<input type="checkbox"/> Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	Justification provided as to why infiltration is not viable.
		<input type="checkbox"/> The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Provided
		<input type="checkbox"/> Proposed discharge rates and volumes are greater than greenfield with no justification.	Provided
		<input type="checkbox"/> Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	Provided
		<input type="checkbox"/> Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	Provided
		<input type="checkbox"/> Proposed discharged rates would increase flood risk elsewhere and need to be re-assessed.	Provided
		<input type="checkbox"/> A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	Provided

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		<input type="checkbox"/> How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	Provided
		<input type="checkbox"/> A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	Provided
		<input type="checkbox"/> Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Included – Climate change allowance on the 3.33% AEP and the 1% AEP events.
		<input type="checkbox"/> Calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	Not required – Not residential development.
		<input type="checkbox"/> Use up to date FEH2022 rainfall parameters in any modelling scenarios.	Included – FEH22 has been used for supporting calculations.
Location of SuDS		<input type="checkbox"/> Drawings need to show all the drainage features (storage and conveyance) with labels the same as those in supporting calculations.	Included – CL / IL and Volumes have been provided.
		<input checked="" type="checkbox"/> Drawings need to show the final design (but not construction issue or preliminary issue).	Objection: Drawings are still preliminary status. At this stage we would expect detailed drainage drawings. Further information is required.
		<input checked="" type="checkbox"/> Cross sections and long sections of all the network and structures such as ponds, basins and swales.	Objection: No cross sections have been provided. Further information is required.

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What is the impact of flood risk on the development?	NPPF Paragraph 182	Updated supporting calculations required to show;	
	SDNSTS S7, S8, S9, S10 and S11	<input checked="" type="checkbox"/> 50% AEP rainfall event does not surcharge in the drainage network.	Objection: Surcharging is shown in the 50% AEP event.
	Level 2 SFRA (Adur and Worthing)	<input type="checkbox"/> 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.	Included – No flooding in the 3.33% AEP plus climate change event.
		<input type="checkbox"/> 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water (e.g. pumping station or substation) within the development boundary.	Included – No flooding in the 1% AEP plus climate change event.
		<input type="checkbox"/> the appropriate climate change allowance must be included.	Included – Climate change allowance on the 3.33% AEP and the 1% AEP events.
		Additional information is required showing; <input type="checkbox"/> above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change must be shown on a drawing with proposed external ground levels and proposed finished floor levels of buildings	Not required – No above ground flooding.
		<input type="checkbox"/> above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change should be designed to be held in the least vulnerable areas of the site e.g. open space.	Not required – No above ground flooding.

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		<input type="checkbox"/> Flood resistance and resilience must be shown to be included in the design. A minimum of 300mm must be provided between the design flood event and the finished floor level.	Included – Freeboard has been included on the drainage layout drawing.
		<input type="checkbox"/> A minimum of 150mm above external ground levels and show that they are sloping away from vulnerable areas such as doorways.	Included – Freeboard has been included on the drainage layout drawing.
		<input checked="" type="checkbox"/> Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as highways or car parks	Objection: Exceedance flow routes have not been provided. Further information is required.
		<input type="checkbox"/> $\frac{1}{2}$ drain down times need to be submitted and show that they are within 24 hours (or within 48 hours for features that are lined e.g. lined tanks or lined basins).	Included – Under 24 / 48 hours.
		<input type="checkbox"/> Any drainage network showing storage features with $\frac{1}{2}$ drain down time greater than the 24 hours (or 48 hours for lined structures) must be redesigned to show how it can meet this standard or be increased in size to accommodate a subsequent storm event of 3.33% plus climate change allowance.	Included – Under 24 / 48 hours.
		<input checked="" type="checkbox"/> The drainage calculations must be shown to include a surcharged outfall to a watercourse or sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.	Objection: Not provided.

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How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 182 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	<input type="checkbox"/> Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Included – Site Specific (i.e. includes action, frequency and responsibility of maintenance).
		<input checked="" type="checkbox"/> A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse will appropriate pollution measures.	Objection: Not provided. This can be conditioned once the above has been rectified.
		<input type="checkbox"/> Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	Not required – No easements required.
		<input type="checkbox"/> Vehicular access route and off-road parking needs to be provided to ponds, basins and swales.	Not required – No vehicular access required.
		<input type="checkbox"/> Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse).	Not required – No easement required for the watercourse.

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		<input type="checkbox"/> Due to the likely long duration build out time (including phased development proposals), a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices	Not required – Not phased.
Other		<input type="checkbox"/> Bespoke advice	