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Lead Local Flood Authority

Date 2nd September 2026

Giles Holbrook
Local Planning Authority
Planning and Development
Adur & Worthing Councils
Portland House
Richmond Road
Worthing
BN11 1HS

Dear Giles,

RE: AWDM/0628/26 - Land Between Sword Street And Martlets Way Worthing West Sussex (Durrington Gasworks Phase 2)

Thank you for your consultation on the above site, received on 11th August 2026. We have reviewed the application as submitted and wish to make the following comments.

This is a Full planning application for a mixed-use development comprising 123 dwellings and commercial floorspace together with associated parking, landscaping, open space and drainage [Land at Durrington Gasworks].

This LLFA provided pre-application advice for this application in January 2026.

The documents submitted do not meet the requirements in the NPPF, PPG Flood risk and coastal change and the National Standards for SuDS. We therefore **object** to this application, and require additional information regarding the following:

Following a review of the documents submitted, we require additional information regarding the following:

Standard 1 (Runoff Destinations):

As West Sussex is seriously water stressed and there is non-potable demand for water (for example toilet flushing for the dwellings and commercial floorspace), we would expect rainwater harvesting to be a material element of the SuDS scheme. This would also help with meeting the requirements of Standard 2. Southern Water provide Environmental Incentives for rainwater harvesting, when designed in accordance with their requirements.

As a result of high groundwater levels and contamination on the site and no water bodies nearby, it is proposed to discharge surface water from the majority of the site into the public surface water sewer in Martlets Way. This is owned by Southern Water.

The applicant has provided a Southern Water pre-planning enquiry response which confirms that capacity exists for a discharge rate of 11.5 l/s to the surface water sewer manhole in Martlets Way. Surface water from the development is proposed to connect to this sewer. It is acknowledged that both the proposed connection and the requisitioned sewer would be located outside the application red line boundary and within third-party ownership.

The proposed discharge rate from the development is 52.6 l/s, in accordance with the brownfield runoff rates set out within the National Standards for SuDS. However, Southern Water's pre-planning enquiry response indicates that only 11.5 l/s of capacity is available within the receiving surface water sewer at Martlets Way. As the proposed discharge rate is approximately five times greater than the identified available capacity, there is a significant risk that additional flows could surcharge the network and increase flood risk elsewhere. We therefore recommend that an updated capacity assessment is undertaken to demonstrate that the Southern Water surface water network can accommodate the proposed discharge without increasing flood risk on or off site.

Standard 2 (Interception):

Whilst Table 7-2 has been provided to demonstrate how the interception requirement will be achieved through the use of attenuation basins, the proposed basin design appears to conflict with the requirements of the National Standards for SuDS. To achieve interception of the first 5 mm of rainfall and comply with Standard 2, detention basins should be designed as unlined features to allow infiltration and treatment of runoff. It is also noted that the report refers to these features as “attenuation basins”. However, attenuation basins typically contain a permanent body of water, whereas the proposed features appear to function as detention basins, which are normally dry between rainfall events. Clarification is therefore required regarding the intended basin type and how the proposed design will achieve the stated interception requirements.

In addition, further information should be provided to demonstrate compliance with Standard 2 of the National Standards for SuDS. We would recommend that the applicant refers to the [West Sussex County Council Sustainable Drainage Systems guidance](#). It is noted that permeable paving and swales are proposed within the drainage strategy; subject to appropriate design, these features are likely to make a positive contribution towards meeting the interception requirements of Standard 2.

Standard 3 (Management of Everyday Rainfall and Flooding):

While the FRA and Drainage Strategy states that there is full containment of surface water runoff for storm events up to and including the 100-year plus 45% allowance climate change”, the hydraulic model calculations demonstrate that there is some surface water flooding occurring in the 1 in 100 year plus climate change event. A more detailed exceedance plan for the 1% AEP event plus climate change is required. While Figure 6-1 is provided, the plan should include any areas/depths of flooding from the drainage network.

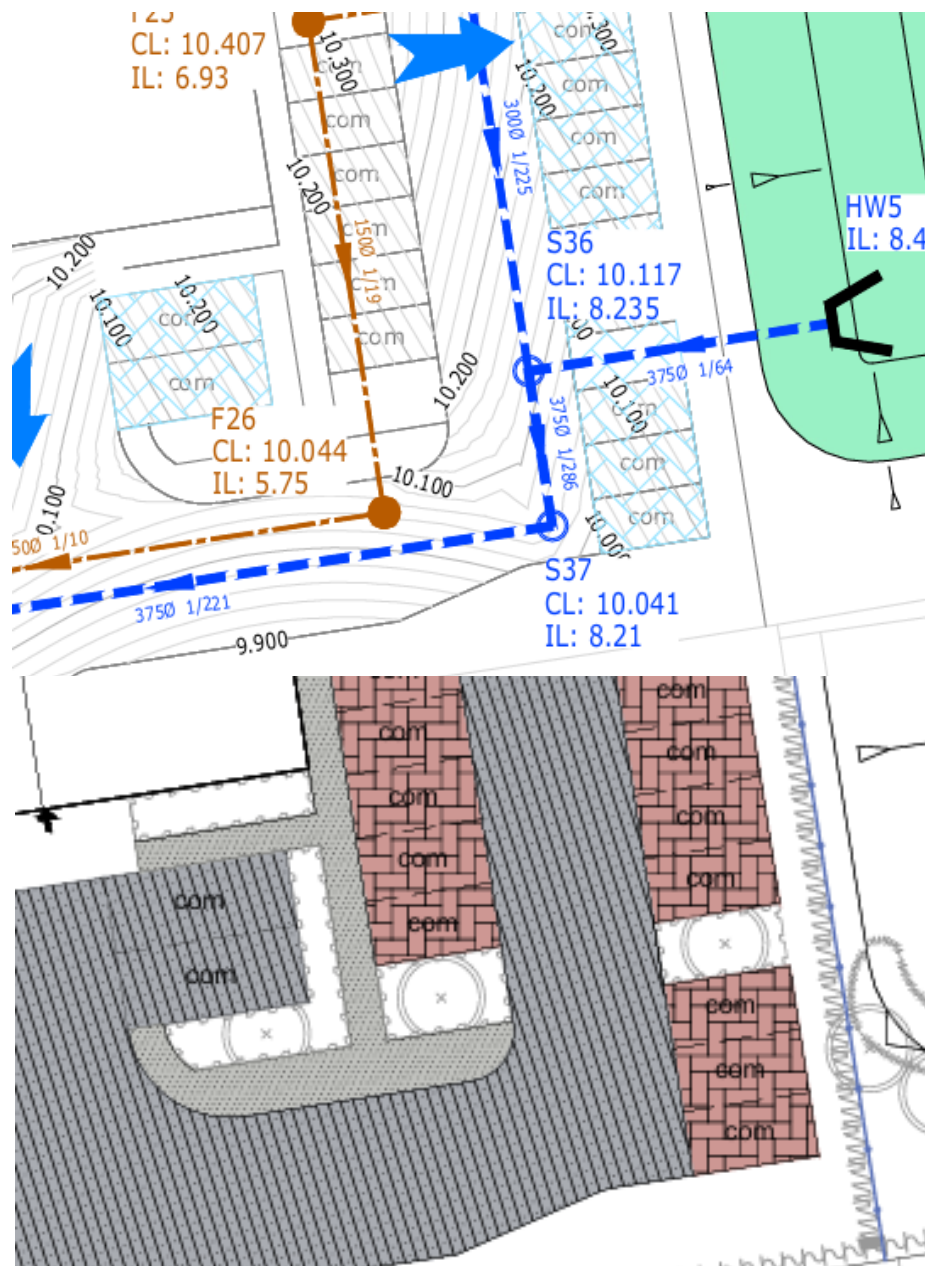
As stated in the National Standards for SuDS, we require evidence to explain why the greenfield rates cannot be achieved for this site.

Standard 5 (Amenity) and 6 (Biodiversity):

As these matters fall outside of the LLFA remit/expertise, we would expect the Local Planning Authority to seek input from other consultees with specialisms in these areas.

It is noted that basin 2 will have a modelled maximum peak depth in the 1 in 100 year plus climate change event of 1.236m.

There appear to be conflicts between the hard landscaping drawings and the drainage strategy. For example, the drainage strategy indicates permeable paving (light blue hatching) adjacent to the industrial building; however, the corresponding area on the hard landscaping drawings is shown as concrete block paving/porous concrete block paving, although the colour distinction is unclear. To avoid ambiguity, all plans and drawings submitted under this application should be consistent and correspond with one another.



There also appears to be some conflicts between areas of permeable paving and Root Protection Areas. The Arborculturalist will be best placed to make comments regarding this matter.

Yours sincerely,

Eleanor Read

Flood Risk Management Team

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