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Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Date 11th July 2025

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

Dear Stephen,

RE: AWDM/0738/25 – 39-41 Brighton Road, Shoreham-by-Sea, West Sussex, BN43 6RE

Thank you for your consultation on the above site, received on 20th June 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an outline application for the demolition of the existing building and the erection of a one to nine-storey block of residential apartments, a commercial unit (Class E), with associated cycle parking and car parking.

We **object** to this planning application in the absence of an acceptable Drainage Strategy relating to:

- The application is not in accordance with the updated [National standards for sustainable drainage systems \(SuDS\)](#). It is unclear why the previous WSCC Policy for the Management of Surface Water is being referred to as this hasn't been used since 2023.
- As there is no other viable method of draining the site, the location of the outfall must be determined at outline stage, to ensure the receiving system has capacity. Given the location of the site, this is likely to be from a third-party.

We support the use of bioretention features and permeable paving. While this is more within the EA remit as the site is not currently at surface water flood risk, it is noted that there isn't much on flood resilience and resistance.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

The following documents have been reviewed, which have been submitted to support the application;

Flood Risk Assessment by WSP, May 2025, First issue

Surface Water Drainage Strategy by WSP, 31/01/2025, First issue