Peter Barnett
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

Date: 21st November 2023

Dear Peter,

RE: **AWDM/1247/23 - Land Between 76 And 78A Brighton Road Lancing West Sussex.**

Thank you for your consultation on the above site. We have reviewed the application as submitted and wish to make the following comments.

The applicant is applying for the construction of 6 townhouses and 2 maisonettes (total 8 dwellings), within a four-storey building with central fifth storey.

Following a review of the submitted information, we would recommend requesting some updated information from the applicant. Firstly, the applicant's calculations should utilise FEH data instead of FSR data, because FSR data is known to underestimate by approximately 20%. In addition, a winter CV value of 1 should be used instead of the current 0.84 and for the 100-year storm plus climate change, 45% should be used not 40% as recommended in DEFRA's climate change allowances. In addition, greenfield runoff rates for the proposed site should also be submitted. Winter groundwater monitoring and infiltration testing that complies with BRE 365 must be completed. Finally, paragraph 28 of the Planning Practise Guidance states that not owning the land is not a valid reason to the pass the sequential test.

We would recommend the application is not approved until updated information is received that addresses the above points.

Yours sincerely,

Louise Tedridge
Sustainable Water Management Officer