



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

1 August 2025

Dear Peter,

**RE: AWDM/0706/25 - Site Of 74 Old Shoreham Road and Land South Of 72 To 88A Old Shoreham Road Lancing West Sussex.**

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 demolition of existing bungalow at 74 Old Shoreham Road to enable access to land to the rear for the construction of nine dwellings along with associated infrastructure. The application is to Adur District Council.

Following a review of the submitted information, we note that the application is not in accordance with the National Planning Policy Framework (NPPF) and its accompanying Planning Policy Guidance (PPG). While we understand the development site has been identified and allocated within the Local Plan and the Sequential Test has been passed, we have serious concerns over the existing flood risk at the site and how the proposed development will impact this risk.

**Surface Water Flood Risk:** The site is shown to be at risk of surface water flood risk. The FRA details mitigation measures through a combination of land raising and the creation of compensatory storage to safely store surface water flood risk. Alongside flood resilience measures and raising floor levels, the proposed dwellings will be safe from surface water flooding. However, it is not entirely clear how this land raising will impact the surrounding area.

**Fluvial Flood Risk:** The FRA also shows that the entire site and the surrounding area is within Flood Zone 3. Land raising is proposed as part of the development, and we have serious concerns surrounding the impact this will have on fluvial flood risk. The proposed development cannot increase the risk of flooding to the surrounding area and the FRA does not appropriately address this risk and the impacts of the development.

**Surface Water Drainage Strategy:** We note that outline drainage information has been provided based upon a worst-case scenario. The drainage design should follow the hierarchy of preference

Matrix House  
Basing View  
Basingstoke, Hampshire  
RG21 4FF  
Tel: +44 1256 318 800  
wsp.com

WSP UK Limited | Registered address: WSP House, 70 Chancery Lane, London WC2A 1AF  
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for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring and winter infiltration testing to BRE DG365 will be required to support the design of any infiltration drainage or to demonstrate it is not a viable option. Calculations should then be provided, to demonstrate no increase in flood risk as a result of the proposed development, using FEH data, a CV value of 1, and a 45% allowance for climate change.

We are concerned at the risk the development poses on the surrounding area, and we are concerned with the safety of any future occupiers and therefore, **we would recommend the application is not approved until updated information is received that addresses the above points.**

#### **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