

Peter Barnett
Development Management
Adur & Worthing Councils
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

Lead Local Flood Authority
Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Date 20 August 2026

Planning Reference: **AWDM/0845/26**

Site Address: **Land South Of West Street And West Of Loose Lane Sompting
West Sussex**

Planning Description: **Application for Approval of Reserved Matters for Phase 3 following hybrid planning permission AWDM/0323/19. Details regarding the scale, layout, appearance, access and landscaping for the erection of 278 dwellings (including 30% affordable housing), a pocket park, LEAP and public open space, and car parking. Includes the submission of details pursuant to Conditions 15 (CEMP), 16 (bat sensitive lighting strategy), 18 (noise), 20 (cycle parking), 21 (car parking), 23 (waste and refuse), 27 (sustainability), 31 (nature conservation), 32 (external materials) and 36 (boundary treatments) of AWDM/0323/19.**

Dear Peter

Thank you for your consultation on the above site. For this consultation, we have reviewed the following documents submitted:

- Phase 3 Drainage Report, prepared by Milestone Transport Planning, dated 22 June 2026, Ref: 2026-06-09 Phase 3 Drainage Strategy Report 26-008, Rev: P02

This is a Reserved Matters application relating to Phase 3 of the development approved under planning permission ADWM/0323/19. The application looks to agree details relating to scale, layout and appearance. The LLFA has reviewed the submitted Drainage Report and whilst we have no objection to the principle of draining surface water via infiltration at this site, we are concerned by the level of detail provided at this stage. Infiltration testing shows that it is a viable method of surface water discharge and we are encouraged by the use of a large infiltration basin to drain one half of the site.

The Drainage Strategy refers to the use of smaller soakaways to drain surface water from individual properties and shared soakaways split over several properties. The LLFA has concern over the use of shared soakaways across the site. Shared SuDS

infrastructure can become very problematic when carrying out required maintenance, repairs or replacement.

The Drainage Strategy suggests it will explore the use of these individual soakaways at Detailed Design stage but given that this is a Reserved Matters application, this could have significant impacts on the viability of the proposed drainage strategy and the overall layout and scale of the site. We would encourage the applicant to assess the viability of individual soakaways at this stage.

Whilst we note a large infiltration basin is being proposed for one of the surface water drainage networks, we are concerned by the use of large underground structures for attenuation and infiltration. Further justification as to why attenuation cannot be provided in open SuDS features is required and a further assessment of Source Control SuDS is encouraged.

Therefore, we **object** to this planning application in the absence of an acceptable Drainage Strategy and supporting information relating to:

- the impact the proposed development may have on flood risk.
- the development not complying with NPPF, PPG or local policies.

Reason

To prevent flooding in accordance with National Planning Policy Framework subsections F2, F4, F5, F6, F7 and F8 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.

We will consider reviewing this objection if the following issues are adequately addressed.

1. Whilst we note this is not an application to discharge the relevant planning conditions relating to surface water drainage, we are concerned that any changes to the drainage design may impact aspects to be approved under this Reserved Matters application.
2. An assessment of the use of individual soakaways is required at this stage to determine their feasibility. The LLFA is concerned over the proposed shared soakaways as this can lead to issues with maintenance in the future.
3. Further justification over the use of below ground storage is required.

Informative:

We also note that applications have been made to discharge the surface water drainage conditions associated with AWDM/0323/19 related to Phase 1 and Phase 2 of this development. No application has currently been made to discharge the relevant conditions for Phase 3 of this development.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

Flood Risk Management Team