Rebekah Hincke
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

2 March 2026

Dear Rebekah,

RE: **AWDM/1394/25 - 19 Farncombe Road Worthing 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 to vary condition 1 (approved plans) and condition 4 (biodiversity net gain plan) and alteration to compliance for conditions 3, 5, 6, 7, 8, 9 and 11 of approved application AWDM/1567/24. Amendments include alterations to landscaping and revised BNG plan in order to provide 10% biodiversity net gain on site. Amended details now include sustainable surface water drainage. ORIGINAL DESCRIPTION: Proposed single storey annexe to the rear of the garden. The application is to Worthing Borough Council.

Following a review of the updated information, we acknowledge the receipt of Technical Note 3 (prepared by Motion Consultants | dated 18th February 2026) demonstrating that the proposed drainage system is able to drain a 1 in 100-year plus climate change event and a consecutive 1 in 10-year event. However, we note that the safety factor has been reduced to 1.5. As per Table 25.2 of the SuDS Manual and in line with previous calculations, a safety factor of 2 should be applied.

We recognise the use of catch pits and pretreatment measures; however, as per Chapter 25.4 of the SuDS Manual, "*even with upstream sediment protection it is likely that some silt will always collect in an infiltration device*". Therefore, base infiltration must be removed to ensure the system is designed to function post-siltation. As per Chapter 25.4 of the SuDS Manual, "*if the design is based on the guidance in BRE (1991) then infiltration from the base is ignored*".

We note that maintenance information has been received; however, this cannot be approved until the proposed method of drainage is approved in case of any changes to the drainage components. Therefore, we still require the following conditions to be attached to the approval of the application.

Condition 1: Construction shall not begin until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The surface

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water drainage scheme must prioritise the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and demonstrate no increase in flood risk as a result of the Proposed Development with sufficient supporting evidence provided to support its viability including supporting calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100) plus climate change critical storms. The design should follow the hierarchy of preference 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 will be required to support the already provided infiltration testing and the design of any infiltration drainage. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of Adur & Worthing Council.

Condition 2: The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

I. a timetable for its implementation.
II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
III. a management and maintenance plan for the lifetime of the development which shall include details of design life and the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Adur and Worthing Council.

Yours sincerely,

Sustainable Water Management Officer