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Lead Local Flood Authority

Louise Prew
Adur and Worthing Councils,
Worthing Town Hall,
Chapel Road,
Worthing,
West Sussex,
BN11 1HA

Date 11 August 2025

Dear Louise,

RE: **AWDM/0938/25 – Union Place Car Park, Union Place, Worthing, West Sussex**

Thank you for your consultation on the above site, received on 23 July 2025. We have reviewed the application as submitted and wish to make the following comments.

This application is for the discharge of conditions 4 (Sustainability plan), 5 (Energy solution), 7 (CMP), 13 (Site levels), 17 (Drainage (Surface Water)), 20 (Foul drainage) and 23 (Phasing plan). As conditions 4, 5, 7, 13, 20 and 23 are not related to flood risk or drainage matters, the LLFA has **no further comment to make** on these conditions.

The LLFA have reviewed the documents submitted in relation to Condition 17, as it relates to drainage. For reference, Condition 17 is worded as follows:

'With the exception of any demolition and clearance works and remediation, development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should be in general accordance with the submitted surface water drainage scheme (as amended) in support of the planning application unless agreed otherwise with the Local Planning Authority. No apartment building shall be occupied until the surface water drainage system serving that part of the development has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity. The scheme shall be implemented as approved and in accordance with any timetable/phasing agreed as part of the approved scheme.

***Reason**: To ensure adequate surface water drainage, including sustainable drainage and to ensure that drainage is adequate for the design lifetime and does not increase flood risk elsewhere and to ensure that detailed drainage design does not harm groundwater resources in accordance with Policies DM20 & DM22 of the Worthing Local Plan 2020 - 2036 and the NPPF, 2023.'*

Whilst we note the drawings are ‘FOR APPROVAL’, the LLFA deem that there is not sufficient information provided regarding the strategy. The drawings do not have any cover or invert levels on the manholes, no finished floor levels of properties and no confirmed volumes for SuDS structures. The outfall also has unknown cover and invert levels and is unclear on its connection point. At discharge of conditions stage, we would expect this level of detail to be provided. Additionally, the supporting calculations shows FLOOD status in the southeast corner simulation (PN 2.00) in the 1% AEP plus 45% climate change allowance event. While we appreciate that the flooded volume is minimal, it should noted that any flooding in any future model runs should be supported with justification on how this is going to be managed on site in order to protect vulnerable infrastructure. We would also request that the 3.33% AEP event has appropriate climate change allowance included on any future model runs.

As such, we are **unable to recommend the discharge of Condition 17**.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 181, 182 and 187 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.

Informative:

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

Annex

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

- Drawing: Drainage Layout Sheet 1 of 2, prepared by Stephen Wilson Partnership Ltd, 23 May 2025, REF 8513-SWP-XX-XX-DP-C-1105 REV C01
- Drawing: Drainage Layout Sheet 2 of 2, prepared by Stephen Wilson Partnership Ltd, 23 May 2025, REF 8513-SWP-XX-XX-DP-C-1106 REV C01
- Supporting Calculations: Surface Water Calculations, prepared by Stephen Wilson Partnership Ltd, 07 May 2025
- Supporting Calculations: Surface Water Calculations – Union Gardens, prepared by Stephen Wilson Partnership Ltd, 07 May 2025
- Drawing: Exceedance Plan, prepared by Stephen Wilson Partnership Ltd, 29 April 2025, REF 8513-SWP-XX-XX-DP-C-1103 REV C01
- Drawing: External Levels Sheet 1 of 2, prepared by Stephen Wilson Partnership Ltd, 23 May 2025, REF 8513-SWP-XX-XX-DP-C-1110 REV C01
- Drawing: External Levels Sheet 2 of 2, prepared by Stephen Wilson Partnership Ltd, 23 May 2025, REF 8513-SWP-XX-XX-DP-C-1111 REV C01