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PO19 1RH

Lead Local Flood Authority

Date 24th July 2024

Louise Prew
Planning and Development
Adur & Worthing Councils
Portland House
Richmond Road
Worthing
BN11 1HS

Dear Louise,

RE: **AWDM/0459/24 - 14-20 South Street, Worthing, BN11 3AA, West Sussex**

Thank you for your consultation on the above site, received on 22nd July 2024. We have reviewed the application as submitted and wish to make the following comments.

This is an application for the approval of details Reserved by Condition 10 (Surface Water Drainage) of Application No AWDM/1906/22.

Condition 10 is worded as follows:

10. 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 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/ No part of the development shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity. Details shall be supported by an assessment of the risks to controlled waters. 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 in accordance with policy DM20 of the Worthing Local Plan 2020 - 2036 and paras 167, 169 & 174 of the NPPF 2021.

We are concerned that the submitted information does not include parameters in the calculations. As such, **we are unable to recommend the discharge of Condition 10.**

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 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. The information submitted demonstrates that the drainage scheme has been built in accordance with the approved details.

We will consider reviewing our response if the following issues are adequately addressed:

1. In the calculations, FEH 2022 rainfall must be used as FSR rainfall underestimates the volume of water. A Cv value of 1 must be used alongside 0 as the additional storage.

The LLFA notes that the discharge of Condition 10 is in connection with Condition 9 and therefore recommend that these are not addressed in isolation.

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,

Eleanor Read
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

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

- Proposed Drainage Layout, CGS Civils, 10th June 2024, rev PL2
- Exceedance Routes, CGS Civils, 10th June 2024, rev PL2
- Foul and Surface Water Drainage Report by CGS Civils, 10th June 2024, rev PL2