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**Lead Local Flood Authority**

Planning Officer
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

Date 05 April 2024

Dear Planning Officer

RE: **AWDM/0104/24 - The Montague Centre, Liverpool Road, Worthing, West Sussex**

Thank you for your consultation on the above site, received on 24 January 2024. We have reviewed the application as submitted and wish to make the following comments.

This application is for the discharge of conditions 10 (Sustainable Surface Water Drainage), 11 (Drainage Maintenance) and 13 (Foul Water Drainage) of AWDM/1624/22.

The LLFA have reviewed the documents submitted in relation to Condition 10 and 11, as they relate to drainage. For reference, Condition 10 is worded as follows:

*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 extended building 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 the NPPF 2023.*

Condition 11 is worded as follows:

*No dwelling shall not be occupied until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and*

*submitted to, and approved in writing, by the Local Planning Authority. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.*

*Reason: To ensure adequate surface water drainage, including sustainable drainage and its maintenance, 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 the NPPF 2023*

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The main issues include;

- No details have been provided regarding the proposed SuDS (green roof) or the discharge rates to the surface water sewer.
- The maintenance plan does not include the proposed SuDS features.

As such, we are **unable to recommend the discharge of Condition 10 and Condition 11**.

**Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 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.

1. The submitted Drainage Statement indicates that a green roof will be used to reduce runoff rates into the surface water sewer and provide some attenuation. We request that further details are provided regarding the attenuation storage to be provided, the existing discharge rate and the proposed discharge rate to confirm that flood risk will not be increased elsewhere.

2. Appendix D of the Drainage Statement provides a drainage maintenance plan. We request that the green roof is included, to ensure that it will be maintained throughout the lifetime of the 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**

**Annex**

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

- Drainage Statement, prepared by GTA Civils, January 2024, Ref. 12787.