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Lead Local Flood Authority

Date 24th February 2026

Peter Barnett
Local Planning Authority
Planning and Development
Adur & Worthing Councils
Portland House
Richmond Road
Worthing
BN11 1HS

Dear Peter,

**RE: AWDM/0028/26 – Land South of West Street and West of Loose Lane,
Sompting, West Sussex**

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

This application is for the discharge of conditions 10, 11, 12 and 13 of approved application AWDM/0323/19.

The LLFA have reviewed the documents submitted in relation to Condition 10, 12 and 13, they relate to drainage. For reference, Condition 10 is worded as follows:

No Phase of the Development shall 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. Winter groundwater monitoring to establish highest annual ground water levels and winter infiltration testing to BRE DG365, or similar approved, will be required to support the design of any Infiltration drainage. No building / 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.

Condition 12 is worded:

No Phase of the Development shall commence 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. The manual is to include details of financial management and arrangements for

the replacement of major components at the end of the manufacturer's recommended design life. 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

Condition 13 is worded:

No Phase of the development shall commence until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values. No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

We have concerns that the submitted information does not meet with NPPF, PPG or the local planning 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.

Several of these issues were raised at reserved matters.

We require additional information on:

1. In the Drainage Strategy Report, there are several mentions of 'preliminary details' and 'at detailed design stage'. This is a discharge of condition application, and the wording of the condition 10 is as follows "full details of the proposed surface water drainage scheme". We do not have the full details currently.
2. As detailed in Table 5, SA/2A and SA/2B both do not have 1m clearance from the maximum groundwater level.
3. There are some locations where the private house soakaways serve two properties. This is likely to create maintenance issues.
4. The Surface Water Crate House Soakaways are not included in the drawings titled Preliminary Drainage Strategy.
5. For the soakaway calculations, the infiltration rate must only be applied to the sides, in line with the SuDS Manual.
6. In the calculations, FEH2022 rainfall, Cv value 1, MADD Factor 0 and summer and winter storms should be used.
7. Rather than examples, we need calculations for all drainage features, which correlate with the impermeable areas drawing.
8. Calculations for a 50% AEP and 30% AEP plus climate change event are required.
9. The attenuation feature references used in the drainage layout do not match the references in the hydraulic calculations. These need to correlate, to allow us to cross-reference.
10. The maintenance and management strategy does not cover who will be responsible for the replacement of features after their design life.

As such, we are **unable to recommend the discharge of Condition 10 and 12.**

As there are no known watercourses within the site, we require no details for condition 13.

Upon receiving a formal reconsultation request from the LPA, when any further information is submitted, we will review our comments and provide an updated response.

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;

Phase 2 Maintenance and Management Plan by Milestone Transport Planning, September 2025, P01

Phase 2 Drainage Strategy Report by Milestone Transport Planning, January 2026, P04