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Date 28 April 2026

Planning Reference: **AWDM/0028/26**
Site Address: **Land South Of West Street And West Of Loose Lane**
Planning Description: **Approval of Details Reserved by Conditions 10 (Surface Water Drainage); 11 (Foul Water Drainage); 12 (Surface Water Maintenance and Management Plan); 13 (Flow to Watercourses) of approved application AWDM/0323/19.**

Dear Peter Barnett

Thank you for your re-consultation on the above site, received on 13 April 2026. For this consultation, we have reviewed the following documents submitted:

- Phase 2 - Drainage Strategy Report, Milestone Transport Planning, March 2026, P01
- Surface Water Maintenance and Management Plan, Milestone Transport Planning, March 2026, P02

The LLFA previously responded to this application on 24 February 2026 raising concerns with the information provided. Since then, the applicant has provided updated information relating to Conditions 10, 12 and 13. The LLFA have no comments to make on Condition 11 as this does not relate to surface water drainage.

For reference, the conditions are worded as follows:

Condition 10

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.

Reason: To ensure adequate drainage and to comply with the National Planning Policy Framework and policy 36 of the Adur Local Plan.

Condition 12:

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.

Reason: To avoid the risk of localised flooding and in the interests of sustainable development having regard to the National Planning Policy Framework and policy 36 of the Adur Local Plan.

Condition 13:

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.

Reason: To avoid the risk of localised flooding and in the interests of sustainable development having regard to the National Planning Policy Framework and policy 36 of the Adur Local Plan.

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

1. The calculations for Soakaway Type TP2_D and Network 25-095 show flooding occurring in the 1% AEP plus climate change event. While it is acceptable for flooding to occur in this storm event, we require details on the location of this flooding. It should be ensured that flooding does not leave the plots, site or impact vulnerable infrastructure. An outline of this flooding on a plan of the site should be submitted.
2. We note that the majority of soakaways now serve individual properties but there are still two scenarios where this cannot be achieved. The LLFA understands the justification and notes that there are no viable alternatives.

Given the potential maintenance issues with shared private drainage systems, the LLFA requires information on how this will be managed and mitigated when the drainage is handed over to private occupiers.

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.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 180, 181 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.

Yours sincerely,

Flood Risk Management Team

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