Gary Peck
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

15 January 2024

Dear Gary,

RE: **AWDM/0020/24 - Car Park South Street Lancing West Sussex.**

Thank you for your consultation on the above site. We have reviewed the application as the drainage consultant acting on behalf of the Council and wish to make the following comments.

The applicant is applying for the approval of details reserved by Conditions 5 (site set-up), 6 (foul sewerage and surface water disposal) and 15 (construction method statement) of Application AWDM0118/23.

Following a review of the submitted information, we note that one of the proposed soakaways does not comply with the discharge hierarchy. The Drainage Strategy indicates that one of the proposed soakaways will have a depth of 3.5m. Deep infiltration (greater than 2m below ground level) is not considered to be shallow infiltration that meets the requirements of the first level of the drainage hierarchy. Whilst they can provide important groundwater recharge via infiltration at depth, it does not mimic the natural drainage system as would shallow infiltration and poses an elevated risk to groundwater quality. We would only expect it to be used as a final option for the location of discharge of surface water on par with a sewer. We would expect shallow infiltration to be utilised, with the invert level attenuation tanks redesigned to be no deeper than 2m below pre-development ground level. Therefore, we would recommend consultation with the Environment Agency to confirm the use of deep infiltration is acceptable as does not create a risk of contamination. Furthermore, we require the slowest infiltration rate to be used in order to reflect the worst-case scenario, and groundwater monitoring to be completed and the highest recorded levels to be submitted.

We would recommend Condition 6 is not discharged until updated information is received that addresses the above points.

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraphs 165-175 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and

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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,

Louise Tedridge
Sustainable Water Management Officer