Peter Barnett
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

Date: 27th October 2023

Dear Peter Barnett,

RE: **AWDM/1070/23 – 106 Brighton Road, Lancing, 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.

The applicant is applying to discharge Conditions 4, 5, 6, 7, 11, and 12 for the demolition of two existing properties and erection of a 4 storey terrace of five dwellings (3no. 4 bedroom and 2 no. 3 bedroom) with balconies, roof terraces and integral garages.

We are not able to comment on Conditions 6, 7, 11, and 12 but are happy to provide comments for Conditions 4 and 5. Following a review of the submitted information, we would recommend not discharging Conditions 4 due to the wrong parameters being used. Drainage calculations should use FEH data instead of FSR data, as FSR data is known to underestimate by approximately 20%. In addition to this, the Winter CV value should be 1 not 0.84. The modelled flood data should include the 100-year storm plus 45% for climate change, as shown on DEFRA's Map for Climate Change Allowances, instead of the 40% that has been used. We would recommend that Condition 4 is not discharged until updated information is received that addresses the above points.

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.

It could be recommended to the applicant to use Type C Permeable Paving so that no infiltration is needed and instead the runoff could be discharged straight to the tidal area. This would allow the paving to be under drained and could potentially remove any groundwater issues. However, this is only a recommendation and will not influence the discharging of Condition 4.

With regards to Condition 5, a clear maintenance plan has been provided, and therefore we are happy for this condition to be discharged.

Yours sincerely,

Louise Tedridge
Sustainable Water Management Officer