WEST SUSSEX COUNTY COUNCIL **DATE: 4 November 2015**
FLOOD RISK MANAGEMENT CONSULTATION

FROM: **Kevin Macknay** **TO: Adur and Worthing Council's**
FAO: Gary Peck

SUBJECT: AWDM/1469/15

Demolition of a part two storey distribution warehouse, offices and ancillary facilities. Construction of a new distribution warehouse and two storey offices and associated facilities, Use class B1, B2 and B8. Adaption of existing access road and services yards, on-site to suit new facilities.

6 Commerce Way, Lancing Business Park, Sompting, West Sussex

RECOMMENDATION:

Advice	X	**Modification**		**More Information**	
Objection		**No Objection**	X	**Refusal**	

West Sussex County Council (WSCC), in its capacity as the Lead Local Flood Authority (LLFA), has been consulted on the above proposed development in respect of surface water drainage.

The following is the detailed comments of the LLFA relating to surface water drainage and flood risk for the proposed development and any associated observations, advice and conditions.

Current surface water flood risk based on uFMfSW for for 30year and 100year events:	**Moderate risk.**

Comments:
Current uFMfSW mapping shows the proposed site to be at 'Moderate' risk from surface water flooding.

It should be noted that the adjacent road and the area around 'Carlton House' are shown to be at 'High' risk of surface water flooding, based on the modelled data. We do have one report dating back to September 1985 of an adjacent unit suffering from surface water flooding.

Any existing surface water flow paths across the site must be maintained.

Reason: NPPF paragraph 103 states – 'When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere..'

Therefore, a wholesale site level rise via the spreading of excavated material should be avoided. Any excavated material kept on site should be located in areas designed and designated for that purpose.

Current ground water flood risk based on ESI Ground Water mapping:	Negligible risk / Moderate susceptibility.

Comments:
The area of the proposed development is shown to be at 'Negligible risk' from ground water flooding on the current ESI maps.
Based on the same mapping the current geology is shown as 'Moderate susceptibility' to ground water flooding. This means the general geology in the area may be suitable for infiltration / soakaways.

Where the intention is to dispose of surface water via infiltration / soakaway, these should be shown to work through an appropriate assessment carried out under BRE Digest 365.

Ground water contamination and Source Protection Zones.
The potential for ground water contamination within a source protection zone has not been considered by the LLFA. The LPA should consult with the EA if this is considered as risk.

Is the proposed development is within or close to an existing Flood Zone, as defined by the National Planning Policy Framework (NPPF):	No.
Comments:	

Records of any ordinary watercourses or culverted watercourses within or in close vicinity to the site:	No.
Comments: Current Ordnance Survey mapping does not show an ordinary watercourse or culverted watercourses within or in close vicinity to the site. Local or field boundary ditches, not shown on Ordnance Survey mapping, may exists around and across the site. If present these should be maintained and highlighted on future development plans. No development should take place within 5m of any watercourse. Future maintenance and access of local field boundary ditches must be considered during the design and planning process.	

Records of any historic ordinary watercourses shown to have once crossed or been in close vicinity to the site:	**Yes.**
Comments: **Historic ordnance survey mapping does show that historic ordinary watercourses once crossed the site, directly under the existing building.**	

Records of any historic flooding within the confines of the proposed site:	None.
Comments: We do not have any records of historic flooding within the confines of the proposed site. This should not be taken that this site has never suffered from flooding, only that it has never been reported to the LLFA.	

Records of any historic flooding in close vicinity to the site and/or on the adjacent public highway:	**Yes.**
Comments: **We do have one report dating back to September 1985 of an adjacent unit suffering from surface water flooding. This should not be taken as the only incident, but it has been the only one report to us as LLFA.**	

Existing highway drainage in the vicinity to the site:	Yes.
Comments: The adjacent road, Commerce Way, has a positive highway drainage system.	

Future development - Sustainable Drainage Systems (SuDs)

SuDs seek to mimic natural drainage systems and retain water on or near to the site, when rain falls, in contrast to traditional drainage approaches, which tend to pipe water off site as quickly as possible.

SuDs offer significant advantages over conventional piped drainage systems in reducing flood risk by reducing the quantity of surface water run-off from a site and the speed at which it reaches water courses, promoting groundwater recharge, and improving water quality and amenity. The range of SuDs techniques available means that a SuDs approach in some form will be applicable to almost any development.

Government policy set out in paragraph 103 of the NPPF expects LPAs to give priority to the use of SuDs in determining planning applications. Further support for SuDs is set out in chapter 5 of the flood risk Practice Guide.

Approved Document Part H of the Building Regulations 2000 establishes a hierarchy for surface water disposal, which encourages a SuDs approach beginning with infiltration where possible e.g. soakaways or infiltration trenches.

Where SuDs are used, it must be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under BRE Digest 365.

Provision for long-term maintenance should be provided as part of any SuDs scheme submitted to the LPA.

Kevin Macknay
Flood Risk Management Team