WEST SUSSEX COUNTY COUNCIL **DATE: 24 April 2019**
FLOOD RISK MANAGEMENT CONSULTATION

FROM: **Ray Drabble** **TO: Adur- Worthing Council**
FAO: Gary Peck

PLANNING REFERENCE: AWDM/0337/18

LOCATION: 4 – 6 Old Shoreham Road, Lancing, West Sussex

RECOMMENDATION:

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

1.0 Introduction

1.1 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 local flood risk.

1.2 Detailed comments have been provided by the LLFA on 6 previous occasions:

a) on 1 May 18 (Reference A);
b) on 25 Jul 18 (Reference C) following the Applicant's Response to the LLFA's earlier comments (Reference B).
c) on 12 Nov 18 (Reference E) following review of the updated FRA 1.1.
d) on 14 Jan 19 (Reference H).
e) on 2 Apr 19 (Reference L).
f) on 16 Apr 19 (Reference N)

1.3 At the request of Adur-Worthing Council the LLFA has now reviewed the most recent response to WSCC Comments (Reference O) and has been asked to formally respond to the same.

2.0 LLFA Position

2.1 The land raising issue discussed in References N and O, albeit only affecting a 3m strip, could technically create additional flow routes onto the lower lying land of the neighbouring gardens. The applicant can and should address this – by ensuring that the flows are intercepted. This could be done by a wall / drain / combination of the two.

2.2 The LLFA recommends that this level of detail is sought from the applicant via a pre-commencement condition.

2.3 The following pre-commencement conditions are recommended for incorporation in any grant of planning permission.

Pre Commencement Conditions:

1. No work is to commence until further details of the boundary arrangements at the south eastern boundary have been clarified to demonstrate that there is no risk of excess run-off from hardstanding areas onto neighbouring properties resulting from changes in levels / ground permeability.
Justification: NPPF paragraph 155…Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2. No work is to commence until a bond of £1000 has been paid to Adur District Council to cover the cost of monitoring the installation of drainage to ensure that it is installed as per the approved design and does not increase flood risk to neighbouring properties.
Justification: The criticality of levels in drainage construction (in relation to seasonal groundwater levels) and existing ground levels (in relation to surface water flow routes) for the system necessitates scrutiny by the council's drainage engineers given the high flood risk pertaining to the site / neighbouring properties.

Pre-occupation condition / clause within S106 agreement if one is being drawn up?

3. No building is to be occupied until a maintenance schedule for the drainage has been approved by Adur District Council. The schedule needs to set out how the long term management of surface water and maintenance, being any works, operation, repair, replacement and inspection necessary to ensure minimum standards of operation of SuDS will be undertaken and secured for the Lifetime of the Development by the Management Company which shall comprise:
   (a) design criteria including manufacturers' specifications where appropriate;
   (b) maintenance schedules and frequency of operations, whether regular, occasional, remedial or monitoring action;
   (c) timescales for the replacement of any elements to ensure effective operation of SuDS / drainage infrastructure including equipment parts;
   (d) upkeep of public areas and any private areas within the curtilage of a shared development;
   (e) establishment of a Management Company;

Ray Drabble
Flood Risk Management Team

References:

A. WSCC LLFA Flood Risk Management Response to application no AWDM/0337/18 dated 1 May 18.
B. CEP's FRA Comment Response to WSCC dated 18 July 18.
C. WSCC LLFA Flood Risk Management Response to application no AWDM/0337/18 dated 25 July 18.
D. Flood Risk Assessment 1.1 dated 19 Oct 18: Proposed development at 4 Old Shoreham Road Lancing, West Sussex.
E. WSCC LLFA Flood Risk Management Response to application no AWDM/0337/18 dated 12 Nov 18.
F. CEP Annotated comments on copy of Reference E (above) dated 23 November 18.
G. Adur-Worthing Council Drainage Engineer comments on application dated 10 January 19.
H. WSCC LLFA Flood Risk Management Response to application no AWDM/0337/18 dated 14 Jan19.
I. CEP (2017) Flood Risk Assessment: New Monks Farm Development Lancing: Issue 1.4 dated 6 Jun 2017.
J. West Sussex LLFA Policy for the Management of Surface Water.
K. CEP (2019) Flood Risk Assessment Addendum dated March 2019.
L. WSCC LLFA Flood Risk Management Response to application no AWDM/0337/18 dated 2 Apr 19.
M. CEP Response to WSCC Comments dated 8 Apr 19.
N. WSCC Flood Risk Management Response to application no AWDM/0337/18 dated 16 Apr 19.

O. CEP Response to WSCC Comments dated 16 Apr 19.