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Lead Local Flood Authority

Mr Easton
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date 1st July 2024

Dear Mr Easton,

RE: BN/11/22/OUT – Barnham, Eastergate, Westergate BEW Parcel SC1, Barnham

Thank you for your consultation on the above site, received on 20th June 2024. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided a Flood Risk Assessment and updated Sustainable Drainage Report to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and Policy W DM2 and Policy W DM3 in Arun Local Plan.

We have **no objection subject to conditions being attached to any consent** if this application is approved, and the Applicant is in agreement with pre-commencement conditions. We request the following wording. If the following conditions are not included, the development would be contrary to NPPF and Policy W DM2 and Policy W DM3 in Arun Local Plan and we would object until such time that the details below are submitted for review.

Condition 1

Prior to or in conjunction with the submission of each Reserved Matters application for the development hereby permitted, details of a scheme for the disposing of surface water by a means of sustainable drainage system shall be submitted to and approved in writing by the Local Planning Authority in accordance with the approved drainage strategy and discharge rates as contained within the approved Flood Risk Assessment by Pell Frischmann, 27/09/2023, rev P05 and Sustainable Drainage Report by Pell Frischmann, 22/04/2024, rev P04. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

- I. Further infiltration testing in accordance with BRE Digest 365 along the length and depth of proposed attenuation basins, as well as in locations where infiltration source

control (e.g. permeable paving) could be used. Surface water runoff rates will be attenuated to 2.4 l/s/ha as stated within section 2.2.3 of the FRA / Drainage Strategy.

II. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% and 1% annual probability rainfall events (both including allowances for climate change).

III. Detailed designs, modelling calculations (using up to date parameters) and plans of the of the drainage conveyance network in the:

- 50% AEP rainfall event does not surcharge in the drainage network.
- 3.33% annual probability critical rainfall event plus 45% climate change to show no above ground flooding on any part of the site.
- 1% annual probability critical rainfall plus 45% climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.

IV. The design of the infiltration / attenuation basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% annual probability rainfall event. This will include surface water which may enter the site from elsewhere.

V. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.

VI. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.

VII. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development. This will also include the ordinary watercourses and any structures such as culverts within the development boundary.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraph 163,165 and 170 by ensuring the satisfactory management of local sources of flooding 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.

Condition 2

Prior to or in conjunction with the submission of each Reserved Matters application a detailed Site SuDS Phase plan which aligns with the site phasing plan shall be submitted

to and approved in writing by the Local Planning Authority. This SuDS Phasing plan shall ensure that each phase does not exceed the agreed discharge rates for that phase and that source control measures are installed within each phase to adequately address the phases own surface water runoff. The plan shall ensure that each SuDS component is adequately protected throughout the development of the scheme. The plan shall show all exceedance routes throughout the development of the scheme ensuring flood risk is not increased elsewhere or to the site itself and that the site remains safe for all exceedance event flow routes for the lifetime of the development during rainfall (i.e. greater than design events or during blockage) and how property on and off site will be protected.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policy W DM2 and Policy W DM3 in Arun Local Plan.

Condition 3:

Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

Reason:

To ensure that the construction of the site does not result in any flooding both on and off site and that all Surface water Drainage features are adequately protected.

Condition 4:

Prior to submission of the first reserved matters application involving buildings, roads or other impermeable surfaces, a strategic surface water drainage strategy for the site shall be submitted to and approved in writing by the local planning authority. The scheme shall be based on the parameters set out in the Sustainable Drainage Report (Pell Frischmann, 22/04/2024, rev P04) or any subsequent, revised version that has first been approved in writing by the local planning authority.

The scheme shall include phasing arrangements, details of primary infrastructure for each phase and plans for drainage asset operation, maintenance and contingency. The scheme shall set out what information, design parameters and design details will need to be submitted at the Reserved Matters stage for each phase of the development. The SuDS Phasing plan shall ensure that each phase does not exceed the agreed discharge rates for that phase and that source control measures are installed within each phase to adequately address the phases own surface water runoff. The plan shall ensure that each SuDS component is adequately protected throughout the development of the scheme. The plan shall show all exceedance routes throughout the development of the scheme ensuring flood risk is not increased elsewhere or to the site itself and that the site remains safe for all exceedance event flow routes for the lifetime of the development during rainfall (i.e. greater than design events or during blockage) and how property on and off site will be protected.

Reason:

The development shall subsequently be implemented in accordance with the approved scheme.

Condition 5:

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include photographs of excavations and soil profiles/horizons, any installation of any surface water structure and Control mechanism.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policy W DM2 and Policy W DM3 in Arun Local Plan.

The applicant has addressed our previous concerns.

Informative:

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Arun District Council on behalf of West Sussex County Council. It is advised to discuss proposals for any works at an early stage of proposals.

Yours sincerely,

Eleanor Read
Flood Risk Management Team



Annex

The following documents have been reviewed, which have been submitted to support the application;

Sustainable Drainage Report by Pell Frischmann, 22/04/2024, rev P04

Flood Risk Assessment by Pell Frischmann, 27/09/2023, rev P05

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Littlehampton, West Sussex, BN17 5LF

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Regards

Flood Risk Management

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