

**WEST SUSSEX COUNTY COUNCIL
FLOOD RISK MANAGEMENT CONSULTATION**

DATE: 19th July 2018

FROM: Kevin Brook

**TO: Arun District Council
FAO: Simon Davis**

PLANNING REFERENCE: BR/142/18/OUT

LOCATION: Richmond Arms, 224 London Road, Bognor Regis, PO21 1AU

RECOMMENDATION:

Advice	☒	Modification	☐	More Information	☐
Objection	☐	No Objection	☒	Refusal	☐

West Sussex County Council (WSSCC), 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 and advice.

Flood Risk Summary

Modelled surface water flood risk	High risk
Comments: Current surface water mapping shows the proposed site is in area which is at high risk from surface water flooding. This risk is based on modelled data only and should not be taken as meaning that the site will/will not definitely flood in these events. However the surface water management strategy should consider this risk and suitable mitigation measures with any existing surface water flow paths across the site 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.	

Modelled ground water flood risk susceptibility	Moderate/high risk
Comments: The area of the proposed development is shown to be at moderate/high risk from ground water flooding based on the current mapping. 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.	

Records of any historic flooding within the site?	No
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.	

Ordinary watercourses present?	No
Comments: Current Ordnance Survey mapping shows no ordinary watercourses in close proximity of the proposed development area.	

Future development - Sustainable Drainage Systems (SuDs)

The Foul Water Drainage Statement included with this application proposes that permeable paving/tarmac and an infiltration blanket, with discharge to main sewer will be used to dispose of the sites surface water.

In line with Defra's non-statutory technical standards for sustainable drainage systems, for a brownfield site such as this, the peak runoff rate and runoff volume should be as close as reasonably practicable to the Greenfield runoff rate/volume from the development for the same rainfall event. If this is not possible, significant betterment, at least 50% reduction in rate from the peak pre-redevelopment rate, should be achievable.

Following the SuDS hierarchy and the spirit of SuDS implementation, betterment for surface water systems on the new developments should be sought. This could include retention at source through green roofs, permeable paving and swales prior to disposal to reduce peak flows. SuDS landscaping, could significantly improve the local green infrastructure provision and biodiversity impact of the developments whilst having surface water benefits too.

Development should not commence until finalised detailed surface water drainage designs and calculations for the site, based on sustainable drainage principles, for the development have been submitted to and approved in writing by the Local Planning Authority. The drainage designs should demonstrate that the surface water runoff generated up to and including the 1 in 100 year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event.

Development shall not commence until full details of the maintenance and management of the SUDs system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved designs.

Please note that Schedule 3 of the Flood and Water Management Act 2010 has not yet been implemented and WSCC does not currently expect to act as the SuDS Approval Body (SAB) in this matter.

Kevin Brook
Flood Risk Management Team