

Planning Application Technical Response

Site: Land at Toddington
Lane
Littlehampton
BN17 7PN
Reference: LU/246/24/PL

Lead Local Flood Authority
Northleigh
County Hall Chichester
West Sussex
PO19 1RH

FULL APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	<p>NPPF Paragraph 159, 167 PPG Paragraph 051 SDNSTS S10</p> <p>WSCC LLFA SuDs Policies 2,3,4,5</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p>Provide updated information within an amended FRA on;</p> <p><input type="checkbox"/> Fluvial flooding from the ordinary watercourse</p> <p><input type="checkbox"/> Surface water flow path originating offsite</p> <p><input type="checkbox"/> Groundwater flooding</p> <p><input type="checkbox"/> Rainwater surcharged sewer flooding</p> <p><input type="checkbox"/> Historic flood information</p>	
Mitigation not appropriate	<p>NPPF Paragraph 159, 167 and 168 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044</p> <p>WSCC LLFA SuDs Policies 2,3,4,5</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p><input type="checkbox"/> Use sequential approach with the following hierarchy.</p> <p>I. how can the development first avoid the risk of flooding</p> <p>II. how will it be mitigated (with evidence)</p> <p>III. how will flood resistance and resilience be employed</p> <p><input type="checkbox"/> The proposal increases the risk of flooding to existing infrastructure, dwellings or property. Mitigation should be reassessed to show how flood risk can be reduced overall.</p> <p><input type="checkbox"/> Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.</p>	
Long term sustainability of the development	<p>NPPF Paragraph 167 and 168 PPG Paragraph 004, 036, 061, 068 and 069</p> <p>WSCC LLFA SuDs Policies 2,3,4,5</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p><input type="checkbox"/> Provide site specific ordinary watercourse or surface water flow path modelling</p> <p><input type="checkbox"/> demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.</p> <p><input type="checkbox"/> Include evidence of appropriate freeboard to finished floor levels from the design flood level</p> <p><input type="checkbox"/> Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event)</p> <p><input type="checkbox"/> Use up to date FEH2022 rainfall data for all design flood events</p>	

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		<input type="checkbox"/> Provide an easement of 3 m from the top bank of any watercourse is required for maintenance. <input type="checkbox"/> Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA) is required, this extends to works required within 8m from the top of the bank (see WSCC LLFA website)	
How does the site currently drain?	<p>NPPF Paragraph 169 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6</p> <p>WSCC LLFA SuDs Policies 2,3,4,5</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<input type="checkbox"/> Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels. <input type="checkbox"/> Greenfield runoff rates and volumes missing <input type="checkbox"/> Greenfield runoff rates need to be recalculated (incorrect input parameters) <input type="checkbox"/> Pre-development brownfield runoff rates missing <input type="checkbox"/> Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters) <input type="checkbox"/> Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed. <input type="checkbox"/> Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	
Where will the site drain to?	<p>NPPF Paragraph 169 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14</p> <p>WSCC LLFA SuDs Policies 2,3,4,5</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p>Drainage location hierarchy has not been followed, further information is required on;</p> <input type="checkbox"/> evidence why rainwater reuse can't be included <input type="checkbox"/> interception has not been calculated and/or provided <input type="checkbox"/> Infiltration proposals – re Groundwater Source Protection Zone I restrictions <input type="checkbox"/> Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls? <input checked="" type="checkbox"/> Surface water sewer – no in principle agreement from owner of the asset <input type="checkbox"/> Combined sewer – no in principle agreement from owner of the asset	<p>Objection: Please provide information.</p>

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		<input type="checkbox"/> In principle objection – proposing to connect surface water runoff to foul sewer <input type="checkbox"/> Detailed justification required why the application cannot be drained via gravity and a pump is required <input type="checkbox"/> Full impact assessment of failure and emergency procedures required if a pump is part of the design <input type="checkbox"/> Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	
<p>Are the 4 pillars of SuDS provided and are they multifunctional?</p>	<p>NPPF Paragraph 169 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p><input checked="" type="checkbox"/> The application must provide water quantity benefits in open, at the surface or above ground SuDS</p> <p><input type="checkbox"/> The application must provide water quality benefits</p> <p><input type="checkbox"/> Appropriate water quality assessment is absent / incorrect</p> <p><input type="checkbox"/> Additional water quality treatment using surface SuDS is required due to the sensitivity of the discharge location (including groundwater, designated surface watercourses or deep infiltration features).</p> <p><input checked="" type="checkbox"/> The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted)</p> <p><input checked="" type="checkbox"/> The application must provide amenity benefits or demonstrate why this is not achievable (lack of space will not be accepted)</p>	<p>Objection: Water butts proposed in DS but not on layout? please provide justification.</p> <p>Objection: please provide justification.</p>
<p>How will the site drain without adversely effecting flood risk elsewhere?</p>	<p>NPPF Paragraph 167, 169</p> <p>SDNSTS S2, S3, S4, S5, S6</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p><input type="checkbox"/> The most precautionary infiltration rate should be used in the design of the attenuation feature</p> <p><input type="checkbox"/> Infiltration rates are shown to be favourable and should be used in the drainage design (even if it's just part of the drainage network).</p> <p><input type="checkbox"/> Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.</p> <p><input type="checkbox"/> The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.</p>	

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		<p><input type="checkbox"/> Proposed discharge rates and volumes are greater than greenfield with no justification</p> <p><input type="checkbox"/> Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.</p> <p><input type="checkbox"/> Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario</p> <p><input type="checkbox"/> Proposed discharged rates would increase flood risk elsewhere and need to be re-assessed</p> <p><input type="checkbox"/> A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.</p> <p><input type="checkbox"/> How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?</p> <p><input type="checkbox"/> A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.</p> <p><input checked="" type="checkbox"/> Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.</p> <p><input type="checkbox"/> Calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.</p> <p><input checked="" type="checkbox"/> Use up to date FEH2022 rainfall parameters in any modelling scenarios.</p>	<p>Objection please provide information.</p> <p>Objection please update calculations.</p>

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Location of SuDS		<input type="checkbox"/> Drawings need to show all the drainage features (storage and conveyance) with labels the same as those in supporting calculations <input checked="" type="checkbox"/> Drawings need to show the final design (but not construction issue or preliminary issue). <input type="checkbox"/> Cross sections and long sections of all the network and structures such as ponds, basins and swales	Objection: Please provide supplementary information for consideration. Are the planters part of the strategy?
What is the impact of flood risk on the development?	<p>NPPF Paragraph 169</p> <p>SDNSTS S7, S8, S9, S10 and S11</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p>Updated supporting calculations required to show;</p> <p><input checked="" type="checkbox"/> 50% AEP rainfall event does not surcharge in the drainage network</p> <p><input checked="" type="checkbox"/> 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.</p> <p><input checked="" type="checkbox"/> 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water (e.g. pumping station or substation) within the development boundary.</p> <p><input checked="" type="checkbox"/> the appropriate climate change allowance must be included</p> <p>Additional information is required showing;</p> <p><input type="checkbox"/> above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change must be shown on a drawing with proposed external ground levels and proposed finished floor levels of buildings</p> <p><input type="checkbox"/> above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change should be designed to be held in the least vulnerable areas of the site e.g. open space</p> <p><input checked="" type="checkbox"/> Flood resistance and resilience must be show to be included in the design. A minimum of 300mm must be provided between the design flood event and the finished floor level</p> <p><input checked="" type="checkbox"/> A minimum of 150mm above external ground levels and shown that they are sloping away from vulnerable areas such as doorways</p> <p><input checked="" type="checkbox"/> Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a</p>	Objection: Please provide calculations

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		<p>drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as highways or car parks</p> <p><input checked="" type="checkbox"/> ½ drain down times need to be submitted and show that they are within 24 hours (or within 48 hours for features that are lined e.g. lined tanks or lined basins)</p> <p><input type="checkbox"/> Any drainage network showing storage features with ½ drain down time greater than the 24 hours (or 48 hours for lined structures) must be redesigned to show how it can meet this standard or increased in size to accommodate an subsequent storm event of 3.33% plus climate change allowance.</p> <p><input checked="" type="checkbox"/> The drainage calculations must be shown to include a surcharged outfall to a watercourse or sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.</p>	<p>Objection: Please provide information.</p> <p>Objection: Please provide information.</p> <p>Objection: Please provide information.</p> <p>Objection: Please provide information.</p>
<p>How will the drainage and watercourse features be maintained?</p>	<p>NPPF Paragraph 169 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11 and S12</p> <p>Policy SD1a, ECC SP1, WDM2, WDM3</p>	<p><input checked="" type="checkbox"/> Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.</p> <p><input type="checkbox"/> Vehicular access route and off road parking needs to be provided to ponds, basins and swales</p> <p><input type="checkbox"/> Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).</p> <p><input type="checkbox"/> Due to the likely long duration build out time (including phased development proposals), a plan and supporting calculations and drawings are required to show, a timeline of how temporary measures will be put in place to protect the water environment and any</p>	<p>Objection: Please provide information.</p>

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		<p>newly built SuDS features. This will include any temporary water quality and flow control devices</p> <p><input checked="" type="checkbox"/> A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse will appropriate pollution measures.</p>	<p>Objection: Please provide information.</p>
Other		<p><input type="checkbox"/> Bespoke advice</p>	

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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Sent: 05 November 2024 14:41

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: LLFA Response To Planning Application Number LU/246/24/PL Land at Todddington Lane, Littlehampton Email 2 of 2.

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LLFA Response To Planning Application Number LU/246/24/PL Land at Toddington Lane,
Littlehampton Email 2 of 2.

Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to

[REDACTED] but the responding officer can be contacted directly via
email if there are any questions relating to this response.

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