

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Simon Davis
FROM:	WSCC – Lead Local Flood Authority
DATE:	31 st January 2022
LOCATION:	Land West of Pagham Road Pagham
SUBJECT:	P/178/21/OUT Outline application with all matters reserved (except access) for the construction of up to 106 new homes, formation of access onto Pagham Road, new pedestrian and cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features and associated ground works and infrastructure. This application is a Departure from the Development Plan and may affect the setting of a Listed Building
RECOMMENDATION:	Advice – No objection

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 comments of the LLFA relating to surface water drainage and flood risk for the proposed development and any associated observations, recommendations and advice.

Flood Risk Summary

Current surface water flood risk based on 30year and 100year events	Low risk
Comments: Current surface water mapping shows that the majority of the proposed site is at low 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. Any existing surface water flow paths across the site should be maintained and mitigation measures proposed for areas at high risk. Reason: NPPF paragraph 163 states – ‘When determining any planning application, local planning authorities should ensure flood risk is not increased elsewhere.’	
Modelled groundwater flood hazard classification	High risk
Comments: The area of the proposed development is shown to be at high risk from groundwater flooding based on current mapping. This risk is based on modelled data only and should not be taken as meaning that the site will/will not suffer groundwater flooding.	

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.

Ordinary Watercourses nearby?	Yes
Comments: Current Ordnance Survey mapping shows ordinary watercourses running along the northern boundary of the site. Works affecting the flow of an ordinary watercourse will require ordinary watercourse consent and an appropriate development-free buffer zone should be incorporated into the design of the development.	

Records of any surface water flooding within the site?	No
Comments: We do not have any records of historic surface water flooding within the confines of the proposed site. This should not be taken that the site itself has never suffered from flooding, only that it has never been reported to the LLFA. Other sites within Pagham have experienced surface water flooding.	

Future development - Sustainable Drainage Systems (SuDS)

The FRA for this application proposes that a detention basin with a restricted discharge to the watercourse would be used to control the surface water from this development.

As indicated by the Arun District Council Drainage Engineers, the drainage hierarchy needs to be followed and the disposal of surface water via infiltration/soakaway needs to be shown to have been fully investigated through an appropriate assessment in conjunction with the District Drainage Engineer.

Part of the site is within Flood Zone 3 and as such, the EA should be consulted.

In the spirit of SuDS implementation, and in line with many of the policies within the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water, betterment for surface water systems on the new developments should be sought. This could include retention at source through rain gardens, permeable paving, swales or bioretention systems prior to disposal to reduce peak flows. SuDS landscaping significantly improves the local green infrastructure provision and biodiversity impact of the developments whilst also having surface water benefits.

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