

Planning Application Technical Response

Site:	New Place Nurseries London Road
LPA Reference:	DC/24/1676
Date Assessed:	14 February 2025



OUTLINE / Reserved Matters APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 170, 181 PPG Paragraph 051 SDNSTS S10 HDCPF 2015 Policy 37 and Policy 38.	<p>Provide updated information within an amended FRA on;</p> <p><input type="checkbox"/> Fluvial flooding from the ordinary watercourse</p> <p><input checked="" 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>	<p>Objection: The LLFA note that the applicant has provided this but the Environment Agency's 'Flood risk from surface water' maps have recently been updated. The applicant should assess the updated data.</p> <p>Informative: The LLFA require the applicant to submit</p>
Mitigation not appropriate	NPPF Paragraph 170, 181 and 187 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044 HDCPF 2015 Policy 37 and Policy 38.	<p><input checked="" type="checkbox"/> Use sequential approach with the following hierarchy.</p> <ol style="list-style-type: none"> I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed <p><input type="checkbox"/> The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.</p>	<p>Objection: The LLFA require the applicant to address the sequential approach based on the updated EA surface water flood maps.</p> <p>Mitigation has been considered based on the assessed flood risk. Should this risk increase based on the updated surface water flood maps then this should be revisited.</p>

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		<input type="checkbox"/> Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.	Safe access and egress has been considered based on the assessed flood risk. Should this risk increase based on the updated surface water flood maps then this should be revisited.
Long term sustainability of the development	NPPF Paragraph 181 and 187 PPG Paragraph 004, 036, 061, 068 and 069 <i>HDCPF 2015 Policy 37 and Policy 38.</i>	<input checked="" type="checkbox"/> Provide site specific ordinary watercourse or surface water flow path modelling. <input type="checkbox"/> Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures. <input type="checkbox"/> Include evidence of appropriate freeboard to finished floor levels from the design flood level. <input checked="" type="checkbox"/> Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event). <input type="checkbox"/> Use up to date FEH2022 rainfall data for all design flood events. <input type="checkbox"/> Provision of an easement of 3 m from the top bank of any watercourse is required for maintenance.	Objection: The LLFA note that the applicant has provided this but the Environment Agency's 'Flood risk from surface water' maps have recently been updated. The applicant should assess the updated data. Residual risk has been considered based on the assessed flood risk. Should this risk increase based on the updated surface water flood maps then this should be revisited. Provided. Objection: The LLFA requires the applicant to include climate change in the 3.33% AEP design flood event. FEH2013 used Not required due to the OWC being culverted.

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		<input type="checkbox"/> Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see West Sussex LLFA website).	N/A
How does the site currently drain?	NPPF Paragraph 182 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6 <i>HDCPF 2015 Policy 37 and Policy 38.</i>	<input checked="" 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.	Objection: The LLFA notes that infiltration testing has taken place however the evidence behind the tests have not been submitted. The LLFA require the applicant to submit the GRM report which shows the infiltration results.
		<input type="checkbox"/> Greenfield runoff rates need to be recalculated (incorrect input parameters).	N/A
		<input type="checkbox"/> Pre-development brownfield runoff rates missing.	Greenfield site
		<input type="checkbox"/> Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters).	N/A
		<input type="checkbox"/> Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	N/A
		<input type="checkbox"/> Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	N/A

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Where will the site drain to?	NPPF Paragraph 182 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14 <i>HDCPF 2015 Policy 37 and Policy 38.</i>	<p>Drainage location hierarchy has not been followed, further information is required on;</p> <p><input checked="" type="checkbox"/> evidence why rainwater reuse can't be included</p>	Objection: The LLFA require the applicant to submit information why rainwater reuse is included.
		<p><input checked="" type="checkbox"/> interception has not been calculated and /or provided</p>	Objection: The LLFA require the applicant to submit information on interception in the calculations.
		<p><input type="checkbox"/> Infiltration proposals – re Groundwater Source Protection Zone I restrictions</p>	N/A
		<p><input type="checkbox"/> Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?</p>	No permissions needed
		<p><input type="checkbox"/> Surface water sewer – no in principle agreement from owner of the asset</p>	N/A
		<p><input type="checkbox"/> Combined sewer – no in principle agreement from owner of the asset</p>	N/A
		<p><input type="checkbox"/> In principle objection - proposing to connect surface water runoff to foul sewer</p>	N/A
		<p><input type="checkbox"/> Detailed justification required why the application cannot be drained via gravity and a pump is required</p>	N/A
		<p><input type="checkbox"/> Full impact assessment of failure and emergency procedures required if a pump is part of the design</p>	N/A
		<p><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>	N/A

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Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 182 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063 <i>HDCPF 2015 Policy 37 and Policy 38.</i>	<input checked="" type="checkbox"/> Overarching proposals of how application must provide water quantity benefits in open, at the surface or above ground SuDS. <input type="checkbox"/> Commitment to the use of SuDS and high-level assessment to include: <ul style="list-style-type: none"> <input type="checkbox"/> water quality <input type="checkbox"/> biodiversity <input type="checkbox"/> amenity 	Objection: The LLFA require the applicant to address water quantity benefits in open, at the surface or above ground SuDS. Provided
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 181, 182 SDNSTS S2, S3, S4, S5, S6 <i>HDCPF 2015 Policy 37 and Policy 38.</i>	<input type="checkbox"/> The most precautionary infiltration rate should be used in the design of the attenuation feature. <input type="checkbox"/> Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate). <input type="checkbox"/> Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety. <input type="checkbox"/> Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required. <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.	Informative: The LLFA require the applicant to address this if this is the method of discharge. Informative: The LLFA require the applicant to address this if this is the method of discharge. Informative: The LLFA require the applicant to address this if this is the method of discharge. Informative: The LLFA require the applicant to address this if this is the method of discharge. Informative: The LLFA require the applicant to address this if this is the method of discharge.

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		<input type="checkbox"/> Proposed discharge rates and volumes are greater than greenfield with no justification	N/A
		<input checked="" type="checkbox"/> Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	Objection: The LLFA require the applicant to submit the 3.33% AEP with climate change allowance
		<input type="checkbox"/> Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	N/A
		<input type="checkbox"/> Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	N/A
		<input type="checkbox"/> A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	Not groundwater dominate area.
		<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?	N/A
		<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.	Not a complex control.
		<input checked="" type="checkbox"/> Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Objection: The LLFA require the applicant to submit the 3.33% AEP with climate change allowance
		<input checked="" type="checkbox"/> Calculations should be resubmitted and demonstrate how 10% urban creep	Objection: The LLFA require the applicant to submit the

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		has been included in the volume of SuDS storage required.	urban creep within the calculations.
		<input type="checkbox"/> Use up to date FEH2022 rainfall parameters in any modelling scenarios.	FEH2013 used
Location of SuDS		<input type="checkbox"/> Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout.	Provided.
How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 182 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	<input checked="" type="checkbox"/> Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Objection: The LLFA require the applicant to provide details of the management company overseeing the maintenance of the site.
		<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.	Objection: The LLFA require the applicant to submit appropriate easements for the proposed ponds on site.
		<input type="checkbox"/> Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.	Provided.
		<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).	Not required due to the OWC being culvert.

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		<p><input checked="" type="checkbox"/> Due to the likely long duration build out time (including phased development proposals), a construction management 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 newly built SuDS features. This will include any temporary water quality and flow control devices</p>	<p>Objection: The LLFA require the applicant to submit information about a construction management 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 newly built SuDS features.</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 the need to discharge to a sewer or watercourse with appropriate pollution measures.</p>	<p>Objection: The LLFA require the applicant to submit an assessment on how water quality will be managed during construction phase.</p>
Other		<p><input type="checkbox"/> Bespoke advice</p>	