TO:	Horsham District Council – Planning Dept
LOCATION:	Firsland Park Estate, Henfield Road, Albourne West, Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Condition 3 to approved application DC/23/2037
REFERENCE:	DISC/24/0276
RECOMMENDATION:	More information required

SUMMARY OF COMMENTS & RECOMMENDATION:

The following supporting documents have been reviewed:

- Construction Details (CGS Civils Consulting Civil Engineers, 30/10/2024, Job no: C3062, Drawing no: 301)
- Drainage Layout (CGS Civils Consulting Civil Engineers, 30/10/2024, Job no: C3062, Drawing no: 101)
- Drainage Report (CGS Civils Consulting Civil Engineers, 28/10/2024, Reference: C3062, Rev: P)
- HDC Decision Notice (Firsland Park Estate Henfield Road Albourne West Sussex)
- Impermeable areas and Overland Flow Route (CGS Civils Consulting Civil Engineers, 30/10/2024, Job no: C3062, Drawing no: 401)
- Location Plan (Brett Incorporated Limited, June 2023, Drawing no: 1221.36/01)
- Supporting Statement (DC/23/2037 – Replacement commercial units for B2/B8/E (g)* (formerly B1) use along with additional communal parking at
- Maintenance Schedule (CGS Civils Consulting Civil Engineers, 28/10/2024, Reference: C3062, Rev: P)

We have reviewed the evidence provided by the applicant in support of the planning application. However, **more information is required** due to the absence of an acceptable drainage strategy and additional information relating to:

- Whether the site drainage meets the requirements of the NPPF, PPG SuDS Non-Statutory Technical Standards (NSTS) (March 2015), the West Sussex LLFA Policy for the Management of Surface Water (2018), and the Horsham District Planning Framework (2015) – Policy 38.

The Drainage report states that the Building Regulations Approved Document H and the DEFRA's National Standard for SuDS have been implemented to select the appropriate surface water discharge method. Following the drainage discharge hierarchy, it is therefore proposed that that the surface water runoff from the site is to be discharged into an existing watercourse that flows along the southern border of the site. It is proposed that all surface water runoff from the roof and hard paved areas is to be captured into positive drainage before discharging into the stream at a restricted rate of 8.4 l/s. The proposed network will make use of proprietary devices; an attenuation tank to cater for the 1 in 100 year + 45 % climate change allowance storm event, and a petrol interceptor to intercept any contaminants prior to the discharge to the stream.

The applicant must provide the following information:

- The drainage catchment for the site must be mapped including any upstream/external catchment inflows that drains down into / through the site from outside the site boundary, as per Section 5.3.1 of the LLFA Policy.

- Plans of the site's existing and proposed flow routes, including any external catchment flows entering and leaving the site, as per Section 5.3.1 of the LLFA Policy.

- Values of the total site area including pre and post development permeable and impermeable areas, with supporting catchment plans.

- An allowance for urban creep must be made in the surface water drainage calculations.

- According to the LLFA Policy 5.4.4, the preferred runoff strategy is to restrict proposed flow rates to the greenfield 1 in 1 year event up to and including the 1 in 100 year event with climate change. Alternatively proposed flow rates are to match greenfield rates to the 1 in 1, 1 in 30 and 1 in 100 year events. However, this alternative strategy requires on-line long term storage to store any increased post development volumes, discharging at no greater than 2l/s/ha. If these are demonstrated to be not achievable, evidence must be provided for proposals to; achieve no increase in runoff from greenfield sites, or a 50% betterment in runoff rates from brownfield sites.
  Therefore, the applicant must firstly demonstrate that the preferred or alternative approach is not viable, before proposing the brownfield approach.

- The Maximum Rainfall Rate (mm/hr) must be set to the maximum value the software allows in the surface water drainage calculations. This parameter can cap the maximum rainfall intensity able to enter a system so if a modelled storm has an intensity higher than the input value then all water above this is lost. Whilst few events exceed this, and only for short periods when they do (meaning the volume lost by capping is small), it can still lead to water being unaccounted for. Therefore, it is recommended that the maximum value be entered to avoid this. Justification and details must be provided if values less than 75 mm/hr are used for a 2-year design event.

- No information has been provided on proprietary devices:
  - In line with Table 26.3 of The SuDS Manual, evidence must be provided of the mitigation for all the proposed SuDS water quality treatment devices, including certificates from proprietary devices. This includes for the proposed underground storage and interceptor.
  - The proprietary device maintenance manuals, for all SuDS devices must be provided, including product maintenance manuals from proprietary devices. This includes for the vortex flow control (the Hydro-Brake), and interceptor device, and underground attenuation device.

- The foul drainage proposed outfall destination must be prioritised as per the hierarchy of foul drainage (requirement H1 of the Building Regulations 2010). In the first instance this is into the existing public foul sewer network if available. A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H is to be provided, including:
  - - A detailed drainage layout, showing pipe sizes, materials, gradients, and outfall location.
  - - Confirmation of permission to connect to a private/public sewer, if applicable, must be provided as per LLFA policy Section 4.1.3.

The applicant must demonstrate that the above foul drainage proposed outfall destination hierarchy has been followed and that a connection to the public sewer is not viable, before proposing the in-site treatment plant as an alternative foul water discharge method.

To demonstrate that a public sewer connection is unreasonable and so an alternative lower hierarchy foul discharge destinations can be pursued, the proposal's feasibility statement must provide a scaled location plan of the nearest public foul sewer, and the distance from the site boundary to the closest connection point of a public sewer. If the connection point distance is more that than the number of properties to be built on the site multiplied by 30m, a public sewer connection is considered unreasonable.

Until the above information is received, Horsham District Council cannot determine the suitability of the proposed scheme with regards to surface water drainage.

In addition to Planning Permission, the applicant may additionally require:

- Ordinary Watercourse Consent (OWC) from the LLFA, to consent to any works adjacent to or within an ordinary watercourse
- An Environmental Permit from the EA, to consent to any; works adjacent to or within a Main River, discharges to ground within a Source Protection Zone 1, and discharges to ground and surface wate from treatment of sewerage.

Please note that the granting of planning permission does not guarantee the granting of an Ordinary Watercourse Consent, or an Environmental Permit.

MAIN COMMENTS:

As above

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	C Bakopoulou E Edney P Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	02/12/2024