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PO19 1RH

Lead Local Flood Authority

Amanda Wilkes
Development Control
Horsham District Council
Parkside
Chart Way
Horsham
RH14 1RL

Date 18th January 2024

Dear Amanda,

RE: **DISC/23/0269 – Christs Hospital School, The Avenue, Christs Hospital, West Sussex, RH13 0LJ**

Thank you for your consultation on the above site, received on 2nd January 2024. We have reviewed the application as submitted and wish to make the following comments.

This application is for the discharge of condition 11 of the previously approved DC/21/1524.

The LLFA have reviewed the documents submitted in relation to Condition 11 for the Phase 1 works, as it relates to drainage. For reference, Condition 11 is worded as follows:

No development to place spoil from the development on the Eastern Fields shall commence until a detailed surface water drainage scheme including a Surface Water Drainage Statement, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development has been submitted to and approved in writing by the Local Planning Authority. The scheme and Statement shall focus on the impact of the raising of the Eastern Fields with development spoil on surface water drainage within the field and on adjacent land including Two Mile Ash, including post-construction verification. The development shall subsequently be implemented in accordance with the approved details and thereafter retained as such.

***Reason:** As this matter is fundamental to prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance in accordance Policies 35 and 38 of the Horsham District Planning Framework (2015)*

We have concerns that the submitted information does not meet with NPPF, PPG or policies in the Horsham District Planning Framework and the proposal will either increase

the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The main issues include;

- Cv value of 1 required
- FSR rainfall has been superseded as it underestimates the volume of water. Please can FEH2022 be used instead.
- Please can maximum level results be provided instead of cascade summary.
- Calculations to demonstrate 50% AEP rainfall event does not surcharge in the drainage network
- We strongly encourage the applicant to continue working with Southern Water in relation to the foul sewer and use of SuDS over foul sewers. We have found the following Southern Water guidance on SuDS near Southern Water assets Microsoft Word - DS Planning Comments V1.2NEW.docx (southernwater.co.uk)

As such, we are **unable to recommend the discharge of Condition 11**.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
FloodRiskManagement@westsussex.gov.uk

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Planning Condition 11-Drainage Statement by Tullys, 12th December 2023
- Cut and Fill Phase 1 Layout by Tullys, 16th May 2023