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Lead Local Flood Authority

**Nicola Pettifer
Development Control
Horsham District Council
Parkside
Chart Way
Horsham
RH14 1RL**

Date 2nd February 2024

Dear Nicola,

RE: DC/23/0406 – Land to the west of Ashington C of E School, Park Lane, Ashington, West Sussex

Thank you for your consultation on the above site, received on 18th December 2023. We have reviewed the application as submitted and wish to make the following comments.

This is a **full** planning application for the demolition of existing buildings and erection of 180 dwellings, all-weather sport pitch, sports pavilion and allotments, with associated access, landscaping, open space and infrastructure.

The issues raised in our previous response have not been adequately addressed.

We **maintain our objection** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA), Drainage Strategy & supporting information relating to:

- Surface water flow paths inadequately addressed, with residential development located within the flow paths
- The application is not in accordance with NPPF paragraph 165, 175 and 175

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.

We will consider reviewing this objection if the following issues are adequately addressed.

1. In the north of the site, the residential development is shown to be located within a surface water flow path. The EA surface water flood risk maps show this area to be

impacted by low, medium and high surface water flood risk. The application is not in accordance with NPPF paragraph 165, 173 and 175, PPG Flood risk and coastal change and S10 in Sustainable Drainage Systems Non-statutory technical standards for sustainable drainage systems (Defra, 2015).

2. The PPG Flood risk and coastal change in paragraph 005 refers to guidance on safe access to be found in the Flood risk assessment guidance for new developments. This guidance refers to Flood Hazard Ratings and thresholds based on research in FD2320/TR2. Using this guidance, the access route has a Hazard Rating of danger for most (includes the general public) based on the Environment Agency Risk of flooding from surface water mapping. The PPG Flood Risk and Coastal change paragraph 047 states 'Access considerations should include the voluntary and free movement of people during a 'design flood'' (where a design flood is 1% AEP (1 in 100 chance a year) event). As the EA surface water mapping is the best available data, if the applicant disagrees with the EA mapping, the applicant must provide surface water modelling to demonstrate there are safe access and egress routes for the lifetime of the development. With the information submitted, it has not been demonstrated that safe access and egress is available for the proposed residential development site, therefore the application does not comply with the NPPF. The proposed access road could also create a loss in floodplain storage, increasing flood risk in the site itself and elsewhere.
3. 3m unobstructed easements need to be provided for all watercourses and SuDS features. This may affect densities and layout, therefore it is essential it is demonstrated at this stage.
4. SuDS should be designed to control surface water close to where it falls. Inlet restrictions to hard engineered drainage solutions prevent design storms up to the 1 in 100 plus climate change event from entering the system. The current design relies on pipes and end of pipe design (basin), which is not acceptable. Increased use of open, at the surface or above ground SuDS required. The current proposals have little biodiversity and amenity benefits (with the exception of the re-designed basin). The application is not in accordance with NPPF paragraph 159, 173 and 175 and PPG Flood risk and coastal change.
5. The proposed discharge rate is greater than greenfield runoff rate. The highway drainage discharge rate from access road is 1.0 l/s and the residential area discharge rate has a discharge rate of 15.2l/s. This totals 16.2l/s for the whole site, however the greenfield runoff rate has been calculated to be 15.2l/s (with Qbar only calculated for the impermeable area). This could increase flood risk elsewhere, therefore the application is not in accordance with NPPF paragraph 175 and 175, PPG Flood risk and coastal change and S2 in Non statutory technical standards for sustainable drainage systems (Defra, 2015). Qbar must be recalculated for whole site, with the overall discharge rate based on the impermeable area for the whole site (i.e. the area that will be drained by the SuDS).
6. The drainage strategy must be labelled to match the pipe/manhole numbers in the submitted calculations. The drainage strategy must also include finished floor

levels. A catchment plan must be submitted demonstrating impermeable areas and discharge points.

7. FSR rainfall on average underestimates the volume of rainfall by approximately 20%, which means the volume of storage required is being underestimated. FEH2022 must be used in calculations instead.
8. NPPF paragraph 173 states 'Development should only be allowed in areas at risk of flooding where ... it can be demonstrated that ... d) any residual risk can be safely managed'. This is supported by PPG paragraph 041 which explains what residual flood risk is. Reliance on the watercourses for exceedance routes is not acceptable, as this assumes they are maintained and have capacity for additional flows. Therefore we need exceedance routing to demonstrate that if the drainage system within the development floods, the routes direct towards the highway and public open space, avoiding risk to people and property.
9. The topographical survey in the FRA has no numbers on. We require this to check the levels on the drainage strategy and within the full network calculations match the topographical survey. We also need this to ensure there is no ground raising in the floodplain of the ordinary watercourses, as this will reduce storage on the site and increase flood risk elsewhere.
10. Full network calculations using up to date parameters must be provided for 50% AEP rainfall event and 3.33% AEP event plus climate change allowance. The application is currently not in accordance with SuDS Non statutory technical standards.
11. As the network is discharging into a watercourse, surcharged outfall results are required. The surcharged level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled. This is to ensure flood risk is not increased downstream, increasing flood risk outside of the site.
12. No drainage for the football pitch has been provided. This must be provided and drained to meet Sports England standards.

Note for case officer: It is noted this is an allocated site within the Southwater Neighbourhood Plan, therefore the site should have already had a sequential (and exception if needed) test. This should include all sources of current flood risk (including surface water) and future flood risk.

As the issues raised above could affect densities and layout, we are unable to recommend conditions currently.

Informatives:

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex County Council. It is advised to discuss proposals for any works at an early stage of proposals.

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

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Annex

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

- Response to LLFA comments on application DC/23/0406 by Ardent, dated 8th December 2023