TO:	Horsham District Council – Planning Dept
LOCATION:	Stables at Glebe Meadow Church Lane Ashurst Steyning
DESCRIPTION:	Approval of details reserved by conditions 3,4,5 and 6 to approved application DC/23/1979
REFERENCE:	DISC/24/0178
RECOMMENDATION:	More information – Condition 4 not satisfied

SUMMARY OF COMMENTS & RECOMMENDATION:

The following supporting documents have been reviewed:

Provided for application DISC-24-0178:

- Application for Approval of Details Reserved by Condition form
- Drainage Statement (17 June 2024)
- Rainwater Harvesting and Purification System Specification (25 June 2024, document reference RH/2001 Spec)

Provided for approved application DC-23-1979:

- Block Plan (20 October 2023)
- Existing Plan (20 October 2023)
- Location Plan (30 October 2023)
- Proposed Layout Plan (20 October 2023)

Condition 4:

Pre-Commencement Condition: No development shall commence until a drainage strategy detailing the proposed means of foul and surface water disposal has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme.

Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).

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.

MAIN COMMENTS:

The applicant should provide the following information. Until this information is received, we are unable to determine the suitability of the proposed scheme with regards to surface water and foul drainage.

- Assessment of the current and proposed drainage patterns entering, within, and leaving site including an understanding of how surface water would flow across the site in normal and rainfall event conditions (see the GOV.UK Long term flood risk mapping).

- Measurement of total site area, pre- and post-development permeable and impermeable areas with supporting catchment plans and calculations.

- Provide the following flow and volume rates with supporting evidence, for both greenfield and previously developed sites (see the UKSUDS.com tool):
  - Existing runoff flow rates during a 100% Annual Exceedance Probability (AEP), 3.33% AEP and 1% AEP storm events.
  - Post development discharge flow rates during a 100% AEP, 3.33% AEP, 1% AEP and 1% AEP + Climate Change storm events.
  - Greenfield runoff flow rate (QBAR).
  - Water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.

- The Drainage Statement shows that surface water runoff produced by the proposed roofs only will discharge to the rainwater harvesting (RWH) system. The surface water runoff from the patio hardstanding area does not drain to the RWH system and has not been considered in the overall strategy. The proposed access and parking hardstanding area is to be permeable paving material. Surplus water from the RWH system is shown to be discharged to the watercourse. The RWH system has been designed solely as a RWH and therefore further evidence is required which will show the system is designed for regular (daily demand) water supply purposes, and additional capacity to provide the necessary stormwater attenuation. For RWH design refer to BS EN 16941-1 2018 On-site non-potable water systems, and Chapter 11 of The SuDS Manual to demonstrate additional stormwater attenuation compliance.

- The Strategic Flood Risk Assessment infiltration suitability mapping for the site and surrounding area indicates that the potential for infiltration at this site is "Moderate". As per 'SuDS Policy 1: Follow the drainage hierarchy' of the West Sussex LLFA Policy for the Management of Surface Water (2018), the applicant must have discharging to ground via infiltration as their priority when considering their primary surface water outfall destination. Consideration of the drainage hierarchy, and discounting of a higher priority destination must be evidenced, with a suitable desk study exercise in the supporting drainage strategy.

- If infiltration discharge methods are proposed, please provide the following:
  - Infiltration testing in accordance with BRE365 at the location and depth of the proposed devices. Minimum proven infiltration rates should be a minimum $1x10^{-6}$ m/s, as per The SuDS Manual (C753). Any infiltration structure should have half drain down times of less than 24 hours and be constructed a minimum of 1.0m above the highest groundwater level.
  - If infiltration discharge methods are not proposed, provide an infiltration assessment supported by a desk-based assessment of soil types, geology, and suitability for infiltration potential (refer to the Horsham District Council Local Plan evidence base). Include a statement of the alternative outfall destination (type) and location for surface water disposal, supported by a marked-up plan.

- The applicant should provide a surface water management strategy including the aim to achieve and better greenfield runoff rates and adherence to the drainage hierarchy (Building Regulations Part H). Rationale for SuDS selected in line with the West Sussex LLFA Policy for the Management of Surface Water (2018), Horsham District Planning Framework (2015) – Policy 38, and industry best practice, such as The SuDS Manual (C753).

- Evidence of measures to prevent pollution of the receiving groundwater and/or surface water should be provided.

- Provide a detailed surface water drainage strategy, including supporting calculations, detailing outfall location, runoff rates as per the LLFA's SuDS Policy 3 (with allowance for urban creep), and proposed volumes of attenuation storage, freeboard, and sizing of all drainage features. The surface water runoff from the hardstanding patio area must be included in the drainage strategy. A detailed drainage layout plan should reference all assets, showing characteristics such as pipe sizes, materials and gradients the manhole type, depth, and size, and the SuDS dimensions, materials, and depths.

- Include a Maintenance and Management Plan, including access requirements, maintenance frequency, responsibility, and proprietary device manuals for all drainage features and SuDS devices. It is noted this is provided for the RWH system in the Rainwater Harvesting and Purification System Specification report and similar should be provided for the drainage system.

- Provide drawings showing conveyance routes for flows exceeding the 1 in 100-year event plus climate change. Additionally, consider how exceedance flows for events greater than the 1 in 100-year event plus climate change will be managed and mitigated on-site without significantly increasing flood risk both on-site and off-site.

- It is noted the Drainage Statement states that the site is not situated either within a floodplain or in an area prone to risk of local flooding. However, the EA flood risk mapping datasets show the site as within areas of Low, Medium and High surface water flood risk.
    a. A Flood Risk Assessment must be provided for this application as per GOV.UK guidance 'Flood risk assessments: applying for planning permission' as the proposal increases the vulnerability classification of an existing development at flood risk.

- It is advised that flood alleviation storage is placed outside of the flood risk extent. If the RWH tank is to be used for stormwater attenuation and situated within the flood risk extent, it must be evidenced that the attenuation will be functionable at times of flooding i.e. flood and flotation proof, and does not increase risk to the site or elsewhere.

- The Drainage Statement shows that foul water is to be treated onsite using a 6-person sewage treatment system, the Matrix CLF1, prior to discharge to the eastern watercourse. For foul water drainage, supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H should be provided.

- The foul drainage outfall must be in line with the foul drainage hierarchy (requirement H1 of the Building Regulations 2010). The strategy must include:
    - A detailed drainage layout with pipe sizes, materials, gradients, and outfall location.
    - Confirmation of permission to connect to a private/public sewer, if applicable.
    - Confirmation of an approved environmental permit, or evidence showing the treatment plant is exempt.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	Y. Riley S. Odigie P. Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	22/08/2024