Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Lead Local Flood Authority

Date 3rd October 2024

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

Dear Amanda,

RE: **DISC/24/0197 – Greenway Academy, Greenway, Horsham, RH12 2JS**

Thank you for your consultation on the above site, received on 27th August 2024. We have reviewed the application as submitted and wish to make the following comments.

This application is for the discharge of conditions 3, 4 and 6 following approval of DC/22/1954.

The LLFA have reviewed the documents submitted in relation to Condition 3 and 4, as they relate to drainage. For reference, Condition 3 is worded as follows:

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 in consultation with Southern Water. 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).

Condition 4 is worded:

Pre-Commencement Condition: No development shall commence until full details of underground services, including locations, dimensions and depths of all existing and proposed service facilities (including the existing drainage pipe adjacent to the western site boundary along Merryfield Drive and any connections onto Greenway) and required ground excavations, have been submitted to and approved by the Local Planning Authority in writing. The submitted details shall show accordance with the landscaping proposals and Arboricultural Method Statement. The development shall thereafter be carried out in accordance with the approved details.

Reason: As this matter is fundamental to the acceptable delivery of this permission, to ensure the underground services do not conflict with satisfactory landscaping in the interests of amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies 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;

1. In the underground survey it says existing surface water pipe on the eastern boundary is blocked. This must be maintained as the pipe is being retained. Without maintenance, flood risk could increase elsewhere. It still remains unclear how the north west area of the site in particular currently drains.
2. In the updated calculations, the impermeable area going into each manhole is not provided. This must be provided so we can ensure the correct impermeable area is being drained.
3. Cv value 1 must be used in design settings in calculations.
4. The time to half empty for the tank has not been provided.
5. The labels on the drainage strategy must match the calculations. The drainage layout has been updated since 2023, but the date hasn't been updated.
6. For the attenuation tank, there is 500mm of cover for the attenuation tank. In the Drainage Strategy dated 13th March 2023, Figure 4 shows minimum cover must be 1000mm.
7. For ATT02 in the calculations, it has been designed with an infiltration depth, however in the drainage layout it is a tanked feature.
8. An exceedance plan for the proposed drainage strategy is required, to ensure routes are not towards buildings and property.

It is disappointing to see a traditional end of pipe design being used. SuDS should be designed to have multifunctional benefits. The current design does not meet the 4 pillars (water quality, water quantity, amenity, biodiversity) of SuDS design. Whilst we appreciate this application is for a school, there are several examples of where SuDS are used in schools.

As such, we are **unable to recommend the discharge of Condition 3 and 4**.

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
FRM@westsussex.gov.uk

Annex

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

- Drainage Strategy by PJCE, 13th March 2023, Revision 4
- Letter from Patrick Parsons, 18th April 2024
- Utility Survey Sheets x 6
- Proposed Drainage Layout by PJCE, 3rd February 2023, Revision P02