

Planning Application Technical Response



Site:	Sandgate Nursery , West End Lane, Henfield, West Sussex BN5 9RD
LPA Reference:	DC/23/0189
Date:	27th June 2023

OUTLINE APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 159, 167 PPG Paragraph 051 SDNSTS S10 Policies 35 & 38 HDC Planning Framework	Provide updated information within an amended FRA on;	
		☐ Fluvial flooding from the ordinary watercourse	
		☒ Surface water flow path originating offsite	
		☐ Groundwater flooding	
		☒ Rainwater surcharged sewer flooding	
		☐ Historic flood information	
Mitigation not appropriate	NPPF Paragraph 159, 167 and 168 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044 Policies 35 & 38 HDC Planning Framework	☐ Use sequential approach with the following hierarchy. I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed	
		☐ The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.	
		☐ Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.	
Long term sustainability of the development	NPPF Paragraph 167 and 168 PPG Paragraph 004, 036, 061, 068 and 069	☐ Provide site specific ordinary watercourse or surface water flow path modelling.	
		☐ Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	

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	Policies 35 & 38 HDC Planning Framework	☐ Include evidence of appropriate freeboard to finished floor levels from the design flood level.	
		☒ Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	As a full set calculations have not been submitted, it is unclear whether climate change allowances have been used when designing the drainage network.
		☒ Use up to date FEH2022 rainfall data for all design flood events.	
		☐ Provision of an easement of 3 m from the top bank of any watercourse is required for maintenance.	
		☐ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA).	
How does the site currently drain?	NPPF Paragraph 169 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6 Policies 35 & 38 HDC Planning Framework	☐ Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	
		☐ Greenfield runoff rates and volumes missing.	
		☐ Greenfield runoff rates need to be recalculated (incorrect input parameters).	
		☐ Pre-development brownfield runoff rates missing.	
		☐ Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters).	

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		☐ Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	
		☐ Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	
Where will the site drain to?	NPPF Paragraph 169 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14 Policies 35 & 38 HDC Planning Framework	Drainage location hierarchy has not been followed, further information is required on;	
		☐ evidence why rainwater reuse can't be included	
		☐ interception has not been calculated and /or provided	
		☐ Infiltration proposals – re Groundwater Source Protection Zone I restrictions	
		☒ Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	Storage results are also required with a surcharged outfall if connecting to a watercourse as this is likely to be bankfull at the corresponding storms.
		☐ Surface water sewer – no in principle agreement from owner of the asset	
		☐ Combined sewer – no in principle agreement from owner of the asset	
		☐ In principle objection - proposing to connect surface water runoff to foul sewer	
		☐ Detailed justification required why the application cannot be drained via gravity and a pump is required	

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		☐ Full impact assessment of failure and emergency procedures required if a pump is part of the design	
		☐ Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	
Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 169 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063 Policies 35 & 38 HDC Planning Framework	☒ Overarching proposals of how application must provide water quantity benefits in open, at the surface or above ground SuDS.	Use of source control measures should be used to limit the size of site control features. Below ground storage are a last resort and should be avoided in green open space.
		☒ Commitment to the use of SuDS and high-level assessment to include: ☒ water quality ☒ biodiversity ☒ amenity	
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 167, 169 SDNSTS S2, S3, S4, S5, S6 Policies 35 & 38 HDC Planning Framework	☐ The most precautionary infiltration rate should be used in the design of the attenuation feature.	
		☐ Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	
		☐ Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	
		☐ Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	

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		☒ The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Please provide this scenario
		☒ Proposed discharge rates and volumes are greater than greenfield with no justification	
		☐ Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	
		☐ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	
		☒ Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	Please check calcs and provide other scenarios. The current discharge rates are proposing to discharge the proposed 1.65 ha impermeable area at the entire site discharge rates (3.4ha) of 11 l/s this needs to be suitably scaled down to ensure that only the area actually designed to drain into the system will discharge at the correct rate otherwise flood risk may increase to the surrounding area.
		☒ A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	
		☐ How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	

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		☐ A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	
		☒ Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	
		☒ Calculations should be submitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	
		☒ Use up to date FEH2022 rainfall parameters in any modelling scenarios.	
Location of SuDS		☒ Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout.	Please provide updated drawing including how these features will connect to a final discharge location
How will the drainage and watercourse features be maintained?	NPPF Paragraph 169 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11 and S12 Policies 35 & 38 HDC Planning Framework	☐ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	
		☐ Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.	
		☐ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).	

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		☐ Due to the likely long duration build out time (including phased development proposals), a plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices	
		☒ A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as the need to discharge to a sewer or watercourse with appropriate pollution measures.	
Other		☒ It must be demonstrated that the receiving watercourse can receive the additional flows/volume from the phases in this application as well as the other phases which discharge into the same features as this application. ☐ It must be demonstrated that the drainage network for these phases can standalone if the phases where the discharge points are located are not constructed.	The FRA contradicts itself by stating infiltration isn't viable supported by evidence to then propose infiltration. The FRA also states that the proposed development will connect to a watercourse, but no evidence of the watercourse has been submitted. Evidence is required that the proposed waterbody has a connection to allow the volume of discharge form the development and can be connected too from the development site. Without this information the application can increase flood risk downstream and may not have a suitable discharge point as highlighted within 6.1.2 of the FRA

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