TO:	Horsham District Council – Planning Dept
LOCATION:	8 Station Road, Billingshurst, West Sussex, RH14 9RE
DESCRIPTION:	Application for Approval of Details Reserved by Condition 3,4,5,6,7 and 15 to approved application DC/24/1017
REFERENCE:	DISC/24/0312
RECOMMENDATION:	Condition 3: Not Satisfied – More Information Required

SUMMARY OF COMMENTS & RECOMMENDATION:

The following supporting documents have been reviewed:

- Horsham District Council Planning Department, Drainage Consultation Response (dated 05/09/2024, ref: DC/24/1017)
- Horsham District Council, Decision Notice (dated 15/11/2024, ref: DC/24/1017)
- Southern Water Consultation Response (dated 08/08/2024, ref: DC/24/1017)
- Water Neutrality Statement (dated: 04/10/2024)
- Markmuir Architect, Rainwater and Greywater Recycling Schematic (dated 13/12/2024, ref: 3_200003B)
- Pre-Commencement Condition 5, Response to Environmental Health Officer (dated 16/12/2024)
- Markmuir Architect, Removal of Conditions 3,4,5,6,7 and 15 (dated 26/01/2024, ref:3_200002B)
- Markmuir Architect, Removal of Conditions 7 Schedule of Materials

Horsham District Council's Drainage Department previously provided consultation to application DC/24/1017 on the 05/09/2024, recommending '**More Information Required**'. The applicant has provided limited additional information (see above) to address shortfalls previously identified. Therefore, more information is still required to support the Discharge of Condition 3, due to the absence of 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:

Condition 3

We are **not satisfied** with the information provided in support of the Discharge of Condition 3.

Until the following information is received, we are unable to determine the suitability of the proposed scheme with regards to surface water and foul drainage:

- Site drainage patterns, an 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 extreme 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, (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 (including the 1 in 1 year and QBAR rate).

-Water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.

- Confirm method of surface water disposal in line with the drainage hierarchy (Building Regulations Part H). The Strategic Flood Risk Assessment infiltration suitability mapping for the site and surrounding area indicates that the potential for infiltration at this site is "Low". 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 prioritise discharging to ground via infiltration when considering the primary surface water destination. Consideration of the drainage hierarchy, and discounting of a higher priority destination must be evidenced, with a suitable desk study exercise.
- 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 $1x10^{-6}$ m/s, as per The SuDS Manual (C753). Any infiltration structure should have half drain down times of less than 24 hours for the 1% AEP rainfall event and be constructed a minimum of 1.0m above the highest groundwater level (where known). Groundwater level monitoring is not requested, based upon current information made available.

  -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).
- 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 (including attenuation provided by the proposed green roof if applicable), 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.
- The applicant must provide evidence of measures to prevent pollution of the receiving groundwater, and or/surface water. Consideration should be given to pollutant removal provided by the green roof and rainwater harvesting system (if applicable).
- The applicant has indicated that surface water from the proposed roof, will discharge to the rainwater harvesting (RWH) system. This system has been designed solely as a RWH system. If the proposal wishes to utilise the RWH system as an attenuation device, further evidence is required to; show the system is designed for regular (daily demand) water supply purposes and has 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.

- Include a Maintenance and Management Plan, including access requirements, maintenance frequency, responsibility, and proprietary device manuals for all drainage features and SuDS devices.
- 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.
- The EA flood risk mapping datasets show the southern area of the site is at Low to Medium risk of surface water flooding, and the proposed access/egress road is located within a Low risk surface water overland flow path. The EA surface water map extents should be overlaid onto the masterplan to demonstrate that the proposed unit is outside the risk area.
- A strategy to ensure adequate drainage of surface water must be included in the surface water drainage proposals to provide mitigation and betterment to the existing scenario.
- 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.
- As per EA Flood risk and coastal change guidance Paragraph 51, this proposed development is classed as 'non major development' in relation to flood risk. Consequently in accordance with EA guidance in Paragraph 27, the Sequential Test must be applied to this 'non-major development', as the EA surface water map shows it to be at risk of surface water flooding, unless a site-specific flood risk assessment demonstrates that no built development within the site boundary, (including access or escape routes, land raising or other potentially vulnerable elements), would be located on an area that would be at risk of flooding from any source, now and in the future.
- 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.

Condition 4,5,6,7 and 15

Discharge of Conditions 4,5,6,7 and 15 were not reviewed as not in the scope of flood risk or drainage.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	A Harman E Edney S Knowles
DEPARTMENT:	Horsham District Council - Drainage
DATE:	13/01/2025