TO:	Horsham District Council – Planning Dept
LOCATION:	Frithknowle Farm Picts Lane Cowfold West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3, 4 and 5 to approved application DC/23/1758
REFERENCE:	DISC/24/0045
RECOMMENDATION:	More information – Condition 3 not satisfied

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the following information:

DISC/24/0045

- Foul and Surface Water Drainage Report (CGS Civils, 30/08/2024, Rev P1, ref: C2795)
- Maintenance Schedule (CGS Civils, 21/02/2024, Rev P, ref: C2795)
- Drainage Layout (CGS Civils, 30/08/2024, Rev PL1, ref: C2795)
- Ditch Depth Plan (Unreferenced, Undated)

DC/23/1758

- Plans and Elevations for Proposed Extension/Conversion of Existing Piggery (A. D. Walsh Developments, January 2023, 123/761/2)

Condition 3

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:

Thank you for providing additional information as requested, this goes some way in providing a suitable response. However, we request the following additional information as per our previous comments.

- The applicant must provide 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 exceedance event conditions.

- The applicant must provide the following flow and volume rates with supporting evidence, for both greenfield and previously developed sites (see the UKSUDS.com tool):
    - existing runoff rates during a 100% Annual Exceedance Probability (AEP), 3.33% AEP, 1% AEP storm events,
    - post development discharge rates during a 100% AEP, 3.33% AEP, 1% AEP and 1% AEP + Climate Change storm events,
    - greenfield runoff rate for the total site then adjusted pro-rata to the proposed impermeable area (Q1 and QBAR) and
    - water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.

- The proposals have been updated to reduce surface water discharge to 1.0l/s. This has not been updated on the Drainage Layout drawing. Nonetheless, the applicant should provide justification for the proposed flow rates though demonstrating an attempt to provide betterment to the existing greenfield rate with consideration of a practical orifice control size. As per the West Sussex LLFA Policy for the Management of Surface Water '*Redevelopment on brownfield land has the potential to rectify or reduce flood risk. In all cases, including on brownfield sites, runoff should where possible be restricted to the greenfield 1 in 1 year runoff rate during all events up to and including the 1 in 100 year rainfall event with climate change…*'.

- Appendix C of the Foul and Surface Water Drainage Report provides modelling detail of the network. The drainage strategy and modelled network must be amended as follows:
    - The Maximum Rainfall Rate (mm/hr) is set at 50mm/hr. This must be set to the maximum value the software allows. Justification and details must be provided if values less than 150mm/hr are used.
    - The design flows Coefficient of Volumetric runoff (CV) Summer value of 0.75 and a Winter value of 0.85 has been used for the design storm value. The CV value must be set to 1 for Summer and Winter in both the design criteria and storm simulation.
    - Calibrate the orifice design head depth (m) to be equivalent to the design storm event (1 in 100 year plus climate change allowance).

- The applicant must provide a 10% urban creep allowance, a climate change allowance for the 30-year return period rainfall event, and information on pipe materials.

- 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.

- Control orifices 100mm or less must be guarded to reduce the risk of blockages. All flow control chambers should be provided with an overflow weir for orifices of any diameter.

- The Drainage Layout drawing shows the surface water network adjacent to the west of the building footprint, however the outline of an existing pond located beneath the proposed decking of the building proposed decking is not shown on the Drainage Layout, as per the Plans and Elevations for Proposed Extension/Conversion of Existing Piggery drawing. The applicant needs to add this information to the Drainage Layout and confirm if the proposed surface water network is located within the pond.

- The applicant must provide evidence of measures to prevent pollution of the receiving surface water. The current proposals indicate no pollutant removal. An assessment utilising the Simple Index Approach as per Chapter 26 of The SUDS Manual (C753) shall be submitted.

- In accordance with the West Sussex Surface Water Management Policy, Ordinary Watercourse Consent must be sought from the LLFA prior to any works that affect the flow of water in the watercourse. Approved planning permission does not allow construction to commence without Ordinary Watercourse Consent.

- The Drainage Layout drawing shows exceedance flow routes directed towards and around the building. Mitigation measures to prevent ingress of water into the building, and to direct flow around the building must be provided. Alternatively, evidence of ground levels directing flows away from the building must be provided.

- A foul water drainage strategy must be provided with full details and supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H, including:
    - A full, detailed drainage layout, showing pipe sizes, materials, gradients, and outfall location.
    - Confirmation of permission to connect to a private/public sewer, if applicable, should also be provided.
    - Confirmation of an approved environmental permit for foul discharges, or evidence showing the treatment plant is exempt.
    - The applicant must provide confirmation of what type of approved or exempt foul treatment device on the Drainage Layout drawing.

ANY RECOMMENDED CONDITIONS: N/A	
NAME:	Y Riley S Odigie P Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	18/09/2024