TO:	Horsham District Council – Planning Dept
LOCATION:	The Old Malthouse, London Road, Henfield, West Sussex
DESCRIPTION:	Construction of single storey dwelling
REFERENCE:	DC/24/1914
RECOMMENDATION:	Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the below information provided by the applicant in support of the planning application:

- Flood Risk Assessment (CGS Civils, 05/02/2025, rev V2, ref: C3470).

The site, and location of the proposed dwelling, falls within Flood Zone 3. Upon review of guidance contained within the Horsham District Council Level 1 Strategic Flood Risk Assessment (2024) and flood extent data provided from the Adur Eastern Branch Updated Climate Change Allowances Model, the site is indicated to fall within Flood Zone 3b. In accordance with Planning Practice Guidance: Flood Risk and Coastal Change, Table 2, residential development, classified as '*More Vulnerable'*, should not be permitted in Flood Zone 3b, which is classified as a functional floodplain. Safe vehicular access and egress is not provided to the property in the design flood event, as required to comply with Planning Practice Guidance. We therefore **Object** to these proposals.

The minimum required scope for an applicant's Drainage Strategy is tabulated in Section 4.5 of the West Sussex LLFA Policy for the Management of Surface Water (2018). This includes but is not limited to the following:

- Proposed discharge destination in adherence to the drainage hierarchy
- Proposed outfall/s location clearly identified
- The following flow and volume runoff rates with supporting evidence (see the UKSUDS.com tool):

  -existing site during the critical 3.33% (AEP) and 1% AEP storm event

  -post development site during the critical 100% AEP, 3.33% AEP, 1% AEP, 1% AEP + Climate Change storm events, with allowance for urban creep as per Section 5.6.4. of the LLFA Policy

  -Evidence the proposed drainage system can contain the critical flow and volume capacity of the; 3.33% AEP event in the drainage system, and the 1% AEP + Climate Change event onsite
- Calculations of proposed outfall flows, limited to the greenfield 100% Annual Exceedance Probability (AEP) runoff rate up to the 1% AEP + Climate Change storm events, or alternatives as per Section 5.4.4 of the LLFA Policy
- Current and proposed exceedance conveyance routes drawings for flows entering, within, and leaving the site. This shows consideration of how events exceeding the 100% AEP + Climate Change event will be managed and mitigated on site without significantly increasing flood risk (see to GOV.UK Long term flood risk mapping)
- Consents from authorities for land drainage or discharge consent, and any third-party agreement as a result of access, drainage works or discharges.

The application form indicates the site will discharge surface water runoff via infiltration. The geological information available shows the site is underlain by Mudstone which is considered to be relatively impermeable. In addition, owing to the site's proximity to the River Adur, groundwater levels may be shallow. Therefore, infiltration may not be feasible. Should discharge via infiltration be discounted, the method of surface water discharge must comply with the drainage hierarchy, Building Regulations Part H.

If infiltration is proposed following this assessment, groundwater monitoring will be required in accordance with Section 5.2.3 of the West Sussex LLFA Policy and to ensure that any infiltration devices are suitably positioned a minimum of 1 metre above the seasonal groundwater table.

Additionally, the following information is required to ensure compliance with LLFA Policy:

- Evidence of an agreement for maintenance is in place over the lifetime of the development; and/or evidence that the SuDS will be adopted by third party. This is to ensure compliance with West Sussex LLFA Policy for the Management of Surface Water SuDS Policy 6: Design to be Maintainable.

To comply with best practice guidance contained in the CIRIA 'The SuDS Manual' (C753), the applicant should provide the following:

- Measures to prevent pollution of the receiving groundwater, and or/surface water, in line with Table 26.4 and Table 26.3 of the SuDS Manual respectively.

To comply with Building Regulations Part H, the following should be evidenced:

- A detailed drainage layout plan should reference all assets showing characteristics such as; pipe sizes and materials, gradients, and manhole type, depth, size, SuDS dimensions, materials and depths

The foul drainage proposed outfall destination must be prioritised as per the hierarchy of foul drainage (requirement H1 of the Building Regulations 2010). In the first instance this is into the existing public foul sewer network if available.

A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H is to be provided, including:

- A detailed drainage layout, showing pipe sizes, materials, gradients, and outfall location.
- Approval is required from Southern Water for connection to the public sewer under Section 106 of the Water Industry Act 1991. If required, the drainage strategy is reliant on this approval. It is illegal under Section 109 of the Water Industry Act 1991 to make a connection to the public sewer without approval.

Any proposed surface water or foul drainage infrastructure should not be subject to flood water ingress.

In addition to Planning Permission, the applicant may also require a Flood Risk Activity Permit for surfaces water discharge to the River Adur.

MAIN COMMENTS:

As above.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	A Harman E Edney A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	27/03/2025