TO:	Horsham District Council – Planning Dept
LOCATION:	Former Arun Feedmills Sincox Lane Shipley West Sussex (Land to South of Nightingale Farm)
DESCRIPTION:	Erection of 8no. dwellings, with associated parking, drainage, and hard and soft landscaping
REFERENCE:	DC/23/2278
RECOMMENDATION:	Objection / More Information

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the following information:

- FRA title (Bellamy Roberts, 7th December 2023, Rev 6, MT/DE/5969/FRA.6)
- Drainage strategy title (Bellamy Roberts, 24th November 2023, D, 5969/001)
- Southern Water response dated 11th January 2024.
- Design and Access Statement (SCd Architects, date unknown)

We **object** to this planning application in the absence of an acceptable drainage strategy and failing to adequately assess the increased risk of flooding due to changing drainage patters relating to:

- Insufficient information provided to determine if the site drainage meets the requirements of the NPPF and 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.

We will consider reviewing this objection if the additional information and clarifications outlined in the section 'Main Comments' below are adequately addressed and evidence provided.

MAIN COMMENTS:

We request the following additional information for the surface water drainage system:

1. Site drainage patterns – assessment of the current drainage patterns entering, within, and leaving site including an understanding of how surface water would flow across the site in normal and rainfall event conditions (see to GOV.UK Long term flood risk mapping). It is evident from the OS mapping and topographical survey that an existing ditch bisects the site, however there are no details of how the existing flows are managed or diverted through the site.
2. Provide the following flow and volume rates with supporting evidence (based on FEH rather than IH124 and FSR):
    - Existing runoff rates for the 100% Annual Exceedance Probability (AEP), 3.33% AEP and 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 flow rate (Q_{BAR})
    - Water storage capacity volumes of the proposed attenuation basin to understand its capacity to attenuate the 1% AEP + climate change storm event.

- Updated drainage strategy drawing to identify size and location of the attenuation basin, which is currently shown as a geocellular storage feature.

3. Fully designed surface water management strategy including the rationale for SuDS selected in line with the:
    - Building Regulations (Part H)
    - West Sussex LLFA Policy for the Management of Surface Water (2018)
    - Horsham District Planning Framework (2015) – Policy 38
    - Industry best practice, such as The SuDS Manual (C753).
4. Detailed surface water drainage strategy, including supporting calculations, detailing outfall location, runoff rate/s as per the LLFA's SuDS Policy 3, with allowance for urban creep, required and proposed volumes of attenuation storage, freeboard and sizing of all drainage features, should be provided. A detailed drainage layout plan should reference all assets showing characteristics such as; pipe sizes and materials, gradients, and manhole type, depths, size, SuDS dimensions, materials and depths.
5. Evidence of a third-party agreement for discharging to an ordinary watercourse. In addition to confirmation of ownership of the land between the application site and discharge location.
6. Maintenance access, frequency, responsibility, and manuals provided in a Management Plan for proprietry systems and SuDS devices.
7. Evidence of measures to prevent pollution of the receiving ordinary watercourse.
8. Drawings showing conveyance routes for flows exceeding the 1% AEP+ climate change storm event.

We request the following information for the **foul water** drainage system:

9. 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. Confirmation of permission to discharge to the watercourse, should also be provided.
10. Consultation should be undertaken with the Environment Agency to gain the necessary permits for the discharge of treated effluent to the watercourse.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	S. Odigie A. Soderberg D. Burgess
DEPARTMENT:	Horsham District Council - Drainage
DATE:	12/04/2024