TO:	Horsham District Council – Planning Dept
LOCATION:	Henfield Sports Centre, Northcroft, Henfield, West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Condition 4, 6 & 7 to approved application DC/23/1177
REFERENCE:	DISC/24/0058
RECOMMENDATION:	Not Satisfied

SUMMARY OF COMMENTS & RECOMMENDATION:

On the 24/04/2024, Horsham District Council's drainage department provided a consultation response to this planning application, recommending a not satisfied position in relation to the discharge of Condition 4, with the provision of more information required. We have reviewed additional evidence provided by the applicant in support of the planning application and the following **recommendations** to the LPA are made.

Condition 4

We remain **not satisfied** with the information provided.

In April, Horsham District Council reviewed the previous revision of the proposed Surface Water Drainage Strategy. This drainage strategy, proposing to discharge to ground, was based upon an assumed infiltration rate of 1×10^{-6} m/s, demonstrating a viable infiltrating surface water drainage strategy at this assumed rate. The applicant is no longer proposing to discharge via infiltration. Insufficient justification has been provided to support this, with infiltration the preferred means of discharge in accordance with the discharge hierarchy (Building Regulations Part H).

The applicant has provided infiltration testing results (to BRE 365) for an adjacent site, which demonstrates viable shallow infiltration rates. The results of deeper infiltration testing in the adjacent site were not performed in accordance with BRE 365, but instead to the 'Soakaway Design Guide' published by Kent County Council in 2000. Whilst the deeper tests are therefore not in accordance with West Sussex LLFA policy, these results none-the-less record infiltration rates again above 10^{-6} m/s, a rate whereby CIRIA guidance (The SuDS Manual C753) indicate '*infiltration viability should be given full consideration where rates of 10^{-6} m/s or greater exist on the site'*.

As Per Sections 5.2.2 to 5.2.3 of the West Sussex LLFA Policy for the Management of Surface Water, and best practice from The SuDS Manual:

• For location siting, adequate freeboard must be provided between the base of the soakaway structure and the highest recorded groundwater level identified in that location; ideally this should be 1m where possible, to prevent flooding and allow for water quality mitigation. As per best practice infiltration devices should be 5m from structures and boundaries, in addition to avoiding Root Protection Zones.

• For infiltration testing, fully BRE 365 compliant investigations should be undertaken during winter / early spring when ground water levels are typically highest, at the location and depth of the proposed soakaways.

• For infiltration rates applied in the design, not all the soakaway faces should be considered for infiltration:

- linear filter drains, only the sides (not the base)

- infiltrating basins and permeable paving, only the base (not the sides)

- the infiltration rate for bases should be reduced to account for siltation, to a maximum rate of 1x10-5 m/s as per Section 25.4 of the CIRIA guidance.

- table 25.2 of the Suds Manual provides appropriate factors of safety to apply in infiltration rates for infiltration device design. Devices below access or upstream residential dwellings need to consider failure as a major inconvenience with appropriate factor of safety

• For design sizing, the soakaway must cater for the 1 in 10 year design storm event plus consideration for climate change. The infiltration structure should drain 50% of its total volume in 24 hours or less for the 1 in 10 year event and for the 1 in 100 year event, between the invert of the lowest entry pipe into the infiltration structure and the base (unless otherwise agreed with the LPA engineer) to provide spare capacity for subsequent storms.

• For detailing, consideration should be given to reduce silt ingress blinding the device base by; adequate guarding at the inlet, and appropriate geotextile filter material wrapping around the device.

• The applicant must provide evidence of 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.

The applicant has indicated the presence of an existing soakaway on-site. Whilst the applicant has indicated this soakaway is not 'functioning', no further details are provided.

The applicant must provide justification as to why infiltration via soakaway is no longer proposed. Until such time as sufficient justification is provided, our previous consultation response from April, still stands.

Condition 6 and 7

Discharge of Conditions 6 and 7 were not reviewed, as not in the scope of surface water and foul drainage.

MAIN COMMENTS:

As above.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	A Harman E Edney P Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	16/10/2024