TO:	Horsham District Council – Planning Dept
LOCATION:	Fieldfare North Heath Close Horsham West Sussex
DESCRIPTION:	Application for approval of details reserved by condition 2 to approved application DC/20/0819
REFERENCE:	DISC/23/0130
RECOMMENDATION:	Condition 2 not satisfied, More information required

SUMMARY OF COMMENTS & RECOMMENDATION:

The following supporting documents have been reviewed:

- Site Block and Roof Plan, Site Elevation (WCEC Architecture, 06/03/2020, Ref: 2022.PL02A)
- Waste Management Plan Condition 2 (Date uploaded to HDC portal: 28/05/2024, Greenways - Site beside Fieldfare North Heath Close RH12 5PH)

Submitted as part of the supporting documents for the application DC/20/0819

- Design and Access Statement (WCEC Architecture, March 2020, Ref: 2022/docs/D&A/March2020_v2)
- Southern Water letter (20/05/2020, Ref: DC/20/0819)
- Southern Water letter (13/08/2020, Ref: DC/20/0819)

Application proposal description:

Erection of a two storey dwelling with associated off street parking and hard and soft landscaping.

Condition 2: (Appeal Decision APP/Z3825/W/20/3265849, 14 July 2021.)

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.

We have reviewed the evidence provided by the applicant in support of the planning application and have the **following recommendations to the LPA**:

The proposed surface water drainage strategy includes:

- A storage tank below the front drive with pump and filter (to provide water for the outside tap and for use in all toilets within the dwelling)
- All paths, drive and patio to be permeable paving.
- Soakaway or Deep Bore soakaway to be used to the rear garden for excess water discharge and to act as top up for the front drive storage tank.
- (There will be a pond to take water to encourage biodiversity but this will not be relied upon in calculations in case it is filled at a later date by future residents).

The applicant is yet to provide the following information, and until such time as this information is received, Horsham District Council cannot determine the suitability of the proposed scheme with regards to surface water and foul drainage.

- The proposed drainage solution utilises a soakaway. Justification must be provided if infiltration to ground is proposed. Where infiltration discharge methods are proposed, infiltration testing must be undertaken in accordance with BRE365*, at the location and depth of proposed devices. Minimum proven infiltration rates are $1x10^{-6}$ m/s, as per The SuDS Manual (C753). Any infiltration structure must have half drain down times less than 24 hours, and be constructed a minimum of 1.0m above the highest groundwater level.
- Where infiltration testing has not been undertaken, an infiltration assessment, supported by a desk-based assessment of soil types, geology and suitability for infiltration potential must be undertaken (See the Horsham District Council Local Plan evidence base), together with an alternative option for surface water disposal.
- The West Sussex LLFA Policy for the Management of Surface Water (2018) notes the minimum design event for traditional soakaways is the 10 year event + climate change. As per best practice infiltration devices should be 5m from structures and boundaries, in addition to avoiding Root Protection Zones.
- The minimum required scope for an applicant's Drainage Strategy is tabulated in Section 4.5 of the LLFA Policy. This includes but is not limited to the following:
- A measurement of pre- and post-development permeable and impermeable areas with supporting catchment plans and calculations
- Proposed discharge destination in adherence to the drainage hierarchy
- Existing and proposed outfall/s location clearly identified
- If discharge via infiltration is proposed, infiltration testing to BRE DG 365 and design must be undertaken as per Sections 5.2.2 to Section 5.2.3 of the LLFA Policy.
- 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.
- Rationale for SuDS selected should be in line with the LLFA Policy and:
    - Horsham District Planning Framework (2015) – Policy 38 and
    - Industry best practice, such as The SuDS Manual (C753)
- 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 detailed drainage layout plan must reference all assets showing characteristics such as; proposed volumes of attenuation storage, finished floor levels and freeboard provided to structures, pipe sizes, materials, and gradients, and access chamber type, depth, invert, and size, SuDS dimensions, materials, invert and depths
- The applicant must also provide a Maintenance and Management Plan including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.
- The 'Waste Management Plan – Condition 2' document states that 'Southern Water have given authority to connect foul drainage for the property to this outlet'. However, this confirmation is not stated in the two Southern Water letters dated 20/05/2020 and 13/08/2020.
- 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 connect to a private/public sewer, if applicable, must also be provided. A foul water capacity check with Southern Water should be also undertaken to confirm that the public foul sewer has adequate capacity to accept the additional foul flows from the proposed development.

MAIN COMMENTS:

The following information has not been provided and should be in line with the West Sussex LLFA Policy for the Management of Surface Water:

- A scaled plan of the contributing catchment to the proposed outfall, showing permeable and non-permeable areas.
- A schematic (Site Block and Roof Plan) showing the approximate location of the proposed soakaway or deep bore soakaway, as well as the location of the storage tank has been provided. However, evidence of infiltration testing results according to BRE365 have not been provided, to prove that the ground is capable of receiving rates and the proposed infiltration design solution will be functional.
- Groundwater levels at a proposed infiltration device location are required to be proven and monitored as per Section 5.2.2 of the LLFA Policy
- Due to the vulnerability of the underlying groundwater being high, deep bore infiltration devices (a high groundwater risk type of SuDS) are unlikely to be acceptable. A groundwater risk screening in line with Table 26.1 and Table 26.5 of The SuDS Manual will be required to determine the risk proposed by the infiltration.
- In the absence of the above information, an alternative method of surface water disposal must be provided.
- Existing and proposed discharge rates, greenfield runoff rate and attenuation storage volume calculations have not been provided. A detailed surface water drainage strategy must be provided with the detail set out in the LLFA Policy 3 above.
- A schematic (Site Block and Roof Plan) showing the approximate location of the existing manhole, where foul water would be discharged is provided. The Southern Water letter (20/05/2020) states that 'a formal application for connection to the public sewerage systems is required in order to service this development'. The Southern Water letter dated 13/08/2020, states that the comments in the previously dated 20/05/2020 letter remain unchanged.
- 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 connect to a private/public sewer, if applicable, must also be provided.

ANY RECOMMENDED CONDITIONS: N/A	
NAME:	C. Bakopoulou E. Edney P Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	04/07/2024