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Lead Local Flood Authority

Date 14 February 2025

Giles Holbrook
Local Planning Authority Name
Planning Department
Horsham District Council
Parkside, Chart Way Horsham,
West Sussex,
RH12 1RL

Dear Giles,

RE: **DISC/25/0009 - Croudace Site, Downsview Avenue, Storrington, RH20 4FS**

Thank you for your consultation on the above site, received on 03 February 2025. We have reviewed the application as submitted and wish to make the following comments.

The applicant is applying for the approval of details reserved by condition 8 to approved application DC/19/2015, an outline planning application for the erection of up to 62 residential units and the creation of a new vehicle access, all matters reserved except for access. For reference, Condition 8 is worded as follows:

8. Pre-Commencement Condition: *Notwithstanding details previously submitted, no development shall commence until a detailed surface water drainage scheme including a Surface Water Drainage Statement, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall be fully coordinated with the landscape scheme (to be submitted), and shall be designed so as to prevent the discharge of water onto the public highway. The development shall subsequently be implemented prior to first occupation in accordance with the approved details and thereafter retained as such.*

Reason: As this matter is fundamental to prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance in accordance Policies 35 and 38 of the Horsham District Planning Framework (2015).

The applicant proposes a deep borehole infiltration solution into the Hythe Beds, with boreholes positioned sufficiently far from buildings. The applicant also proposes to utilise a pond at the north of the site to attenuate the collected surface water. Groundwater monitoring has also been undertaken at the site.

However, further information is required on groundwater contamination risks and surface water treatment and water quality. As such, we are **unable to recommend the discharge of Condition 8** in the absence of acceptable supporting information relating to:

- Further evidence is required to assess groundwater contamination risk linked to deep borehole soakaways.
- Further evidence of Environment Agency's approval over the implementation of deep borehole soakaways.
- Not complying with NPPF, PPG or local policies

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraph 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

1. Groundwater contaminations risks linked to deep bore soakaways are measured and addressed and mitigation measures are adequately identified.
2. As an advisory the Environment Agency's approval may be required for the use of deep bore soakaways and they may need to review the proposed drainage strategy.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

Flood Risk Management Team

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Drainage Statement, by Croudace Homes, November 2023 and Revision D.