TO:	Horsham District Council – Planning Dept
LOCATION:	Ebbsworth Cottage The Street Nutbourne West Sussex
DESCRIPTION:	Creation of car parking and driveway and facing existing concrete retaining walls with stone to match the front garden wall, extension of existing garden wall.
REFERENCE:	DC/24/0552
RECOMMENDATION:	More information required

SUMMARY OF COMMENTS & RECOMMENDATION:

The following supporting documents have been reviewed:

- Technical Note (BP Civils, 17/10/2024, Project no: D2309)
- Location, Site, Block Plans and Topographical Survey (Folkes Architects, April 2024, Job no. 24026, Drawing no. 2.01)
- Existing Site Plan, Car Parking Layout, Elevations and Front Garden Wall extension (Folkes Architects, April 2024, Job no. 24026, Drawing no. 2.02)

We have reviewed the evidence provided by the applicant in support of the planning application. However, **more information is required** due to the absence of an acceptable drainage strategy and additional information relating to:

- Whether the site drainage meets the requirements of the NPPF, 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.

The applicant must provide the following information:

- Measurement of pre and post development permeable and impermeable areas with supporting catchment plans and calculations., which clearly shows how surface water from both the existing concrete slab and the proposed gravel retention system will be discharged.

- The following flow and volume rates with supporting evidence, for both greenfield and previously developed sites (see the UKSUDS.com tool):
  - Existing runoff flow rates during a 100% Annual Exceedance Probability (AEP), 3.33% AEP and 1% AEP storm events.
  - Post development discharge flow rates during a 100% AEP, 3.33% AEP, 1% AEP and 1% AEP + Climate Change storm events.
  - Greenfield runoff flow rate (QBAR).
  - Water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.

- The applicant states that the drainage hierarchy, as detailed within Building Regulations Approved Document H, as well as the SuDS Manual (CIRIA C753), have been followed, to select the appropriate surface water discharge method. The fact that these guidelines have been followed this needs to be demonstrated. The applicant must provide evidence of Southern Water's records.
  - To demonstrate that a public sewer connection is unreasonable and so alternative lower hierarchy foul discharge destinations can be pursued, the proposal's feasibility statement for a suitable foul drainage destination must

provide a scaled location plan of the nearest public foul sewer, and the distance from the site boundary to the closest connection point of a public sewer. If the connection point distance is more that than the number of properties to be built on the site multiplied by 30m, a public sewer connection is considered unreasonable.

- The Technical Note proposes that:
    - the existing concrete slab, which forms part of the retaining structure, will be retained. In front of this, it is proposed that the existing unmade surfacing will be replaced with a gravel retention system, complete with a gravel surface finish. This will provide a free-draining, permeable surface. The existing made ground will be excavated and replaced within an appropriate granular sub-base material to aid the free-draining nature of the proposed finish.

  The applicant must demonstrate how surface water from both the existing concrete slab and the proposed gravel retention system will be discharged.

- Evidence of measures to prevent pollution of the receiving groundwater and or/surface water must be provided. Proposals must demonstrate the developments risk to and mitigation provided for water quality risks to surface water and groundwater bodies. This is required to comply with SuDS Policy 7: Safeguard Water Quality as per Section 6.1 of the LLFA Policy. Generally, an appropriate assessment to provide is the Simple Index Approach (SIA) of Section 26 in SuDS Manual (CIRIA C753).

- A Conceptual Drainage Arrangement layout is appended in the Technical Note (Appendix A) showing an indicative design of the existing concrete slab and the existing made ground, which is proposed to be excavated and replaced with granular sub-base material. The indicative layout also illustrates the levels within the site. A Detailed surface water drainage strategy, including supporting calculations, detailing outfall location, runoff rate/s as per the LLFA's SuDS Policy 3, required and proposed volumes of attenuation storage, freeboard and sizing of all drainage features, must be provided.
  A detailed drainage layout plan should be included that references all assets showing characteristics such as; pipe sizes and materials, gradients, and manhole type, depth, size, SuDS dimensions, materials and depths.

- If applicable, a third-party agreement to discharge surface water into their drainage system must be provided.

- Include a Maintenance and Management Plan, including access requirements, maintenance frequency, responsibility, and proprietary device manuals for all drainage features and SuDS devices.

- Provide drawings of the existing site and proposals showing; conveyance routes both within and entering, leaving the site for flows exceeding the 1 in 100-year event plus climate change. Additionally, consider how exceedance flows for events greater than the 1 in 100-year event plus climate change will be managed

and mitigated on-site without significantly increasing flood risk both on-site and off-site.

Until the above information is received, Horsham District Council cannot determine the suitability of the proposed scheme with regards to surface water drainage.

MAIN COMMENTS:

The Technical Note states that infiltration is the highest-ranking method of surface water disposal. As such, investigation is required to ascertain the soakage potential of the underlying soils.

- The BGS Bedrock geology and Superficial deposits have been assessed; the Geology of Britain viewer identifies that the site is located on a 'Hythe Formation-Sandstone'. No Superficial deposits are identified at the location of the open parking area, although 'Head deposits – Clay, Silt, Sand and Gravel' are identified to the east.

  Infiltration testing has been undertaken at the site at 2 locations on 24/09/2024, confirming that 'Sandstone' is the underlying bedrock geology. The results of the infiltration testing undertaken at the site demonstrated poor infiltration rates. As a result, tests in compliance with BRE365 methodology could not be achieved. It is then concluded that infiltration is not a viable means of supporting the open parking area.

- According to the Technical Note, the second highest ranking method of surface water disposal in view of the drainage hierarchy is to discharge to a watercourse. There are no such features within the vicinity of the site to which a connection could be established with.

- Where it is not possible to infiltrate or discharge to a watercourse, it can be acceptable to discharge to a public surface water sewer. The Technical Note states that upon review of Southern Water's records, there are no such assets within the vicinity of the site.

- In view of the above considerations and constraints, the Technical Notes states that opportunities to drain the area are limited.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	C Bakopoulou S Odigie P Mennell
DEPARTMENT:	Horsham District Council - Drainage
DATE:	26/11/2024