

The Old Piggery, Fryern Road, Storrington, West Sussex, RH20 4BJ

Response to HDC Drainage consultation | DISC/26/0238 (holding objection, 09/09/2026) | Arbtech ref ARB-44028094-DDS-01

Complete the shaded columns (F–H). Type: Objection = must be resolved to lift the objection; Information = evidence/assessment requested; Advisory = separate con.

Ref	Category	Type	HDC Drainage comment
1	Outfall — receptor & connectivity	Objection	The outfall for the site's foul and surface water drainage is in a shallow roadside ditch. The ditch lies outside the application (and ownership) boundary and its connection to the wider watercourse network is unknown. There may be an outfall into the existing watercourse through the neighbouring ancient woodland. If there is no existing connection from the roadside ditch to the watercourse in the woodland, water may slowly infiltrate or overtop the ditch and flow over the road towards the ancient woodland. The applicant should provide an understanding of this, acknowledging whether there is an existing connection from the ditch to the watercourse in the ancient woodland. The applicant must obtain permission in principle from the landowner for the use of the ditch in the drainage strategy.
2	Flood zone — surcharged outfall	Objection	The site predominantly lies in flood zone 1; the red line boundary abuts flood zone 2 and 3, but the outfalls for the proposed drainage strategy both lie within flood zone 2 and 3. Causeway calculations have not considered a surcharged outfall scenario. During the development lifespan it is likely the foul and surface water outfalls will be submerged; of most concern is the outlet for foul. The drainage strategy should incorporate consideration of these events to mitigate concerns regarding contamination.
3	Drawing — obscured viewport	Objection	Information regarding the foul drainage network / sewage treatment system is obscured by the viewport on the Detailed Drainage Strategy Plan 44028094_1001A.

4	Treated effluent outfall — controls	Objection	With regard to the treated effluent outfall, HDC notes no flap valve has been incorporated (to provide visibility for future EA inspections), but the outlet is in a flood zone so this may not be an appropriate consideration in this instance. A flow control is recommended, and an inspection chamber and shut-off valve downstream of the sewage treatment plant should be provided, to control output in the event of failure, preventing contamination of the receiving ditch and surface water.
5	STP siting — beneath permeable paving	Objection	HDC do not consider it appropriate for the sewage treatment tank to be located beneath an area of permeable paving. In the event of fault or structural failure, the sewage treatment plant could contaminate surface water captured in the sub-base of the permeable paving before moving downstream.
6	STP siting — vehicle loading	Objection	The sewage treatment plant must not be located in an area where it is likely for vehicles to drive over.
7	Catchment — patio / urban creep	Objection	HDC notes the justification for the exclusion of urban creep. Whilst the consideration is reasonable, the application is not. The patio has not been included in the contributing catchment area, on the basis that it does not positively drain into the surface water drainage system. Runoff is expected from this patio, and drainage from it is reliant on suitable SuDS incorporating appropriate planting and/or suitable infiltration rates; this information has not been provided. Levels and the resulting slope of the patio are unknown, and its location and scale have not been disclosed. HDC are unable to accept the calculations as they stand without further information. The catchment area must include all areas of proposed hardstanding, at which point HDC may choose to overlook the requirement for urban creep; otherwise urban creep must be applied. HDC expect to see information provided about the proposed patio.
8	Storage / overland flow / freeboard	Comment	The permeable paving offers tanked sub-base attenuation; no additional offline storage has been provided, which may be worthy of consideration but is not essential. Overland flows must be directed away from the property. HDC note 150 mm freeboard has been considered between finished floor level and external ground level.

9	Watercourse — flow-regime assessment	Information	If a ditch and/or watercourse is present on site, an assessment of each feature must be provided to identify whether it is expected to contain flowing water throughout the year (with the range of expected water levels), to seasonally dry up, or to stay dry for most of the year.
10	Watercourse — connectivity / context	Information	If a ditch and/or watercourse is present, context must be provided regarding its connectivity to waterways in the wider landscape, as well as influences which might affect water levels in the feature both upstream and downstream.
11	Watercourse — ownership	Information	If a ditch and/or watercourse is present on site or along the boundary of the site, the applicant must demonstrate ownership of the ditch/watercourse.
12	Watercourse — landowner permission	Information	If a ditch and/or watercourse is to be the intended outfall for surface water and/or treated effluent from a package treatment plant, the applicant must obtain permission from the landowner for use of that feature.
13	Pollution prevention — evidence	Information	The applicant must provide evidence of measures to prevent pollution of the receiving groundwater and/or surface water.
14	Advisory — EA permit (treated foul)	Advisory	In addition to planning permission, the applicant may additionally require a permit to discharge treated foul water to a water body from the Environment Agency, where non-mains foul drainage is proposed.
15	Advisory — Ordinary Watercourse Consent	Advisory	In addition to planning permission, the applicant may additionally require Ordinary Watercourse Consent from the Lead Local Flood Authority at West Sussex County Council, to consent to any works adjacent to or within an ordinary watercourse.
16	Advisory — rainwater harvesting	Advisory	Whilst not a mandatory requirement, HDC welcome and encourage the consideration of rainwater harvesting within the proposed development, for non-potable use.

isent or non-binding. Priority is a suggested triage only.

Arbtech response / action	Status
Applicant to confirm ownership of ditch and survey to outfall into OS watercourse (assumed in woodland opposite).	With client
Causeway model re-run with a surcharged-outfall boundary. Storage revised to 520 mm Type 3 (30% void) over 100 mm Formavoid (70% void) — $\approx 45.6 \text{ m}^3$ effective — with a 35 mm level-invert control at IL 29.925. No flooding at 1% AEP + 45% CC (peak 30.519 mAOD, 43.4 m^3 , 156 mm below the paving surface).	Addressed
Drawing re-issued at Rev B — the foul network, treatment plant and treated-effluent outfall are now shown clear of the viewport.	Addressed

100 mm HDPE non-return valve added to the treated-effluent headwall to prevent backflow (outfall in FZ2/3). A penstock/shut-off isolation and sampling chamber (FWMH3) is provided immediately downstream of the plant to isolate the discharge on failure and retain EA sampling access.	Addressed
Package treatment plant located clear of the tanked permeable pavement.	Addressed
Plant sited outside vehicle-trafficked areas.	Addressed
Patio specified as permeable paving and included within the positively-drained catchment; a 10% urban-creep allowance has additionally been applied. Revised contributing area 0.048 ha.	Addressed
Additional (offline) storage now provided via the 100 mm Formavoid layer. Exceedance surcharges at the permeable-paving surface (150 mm below FFL) and routes overland north to the same watercourse, away from the dwelling (confirmed by LiDAR). 150 mm freeboard retained.	Addressed

Applicant to confirm ownership of ditch and survey to outfall into OS watercourse (assumed in woodland opposite).	In progress
Applicant to confirm ownership of ditch and survey to outfall into OS watercourse (assumed in woodland opposite).	In progress
Applicant to confirm ownership of ditch and survey to outfall into OS watercourse (assumed in woodland opposite).	With client
Applicant to confirm ownership of ditch and survey to outfall into OS watercourse (assumed in woodland opposite).	With client
CIRIA C753 Simple Index Approach provided. Groundwater: no pathway — infiltration ruled out (BRE 365, PT1791), system fully tanked. Surface water: pervious-pavement mitigation 0.7 / 0.6 / 0.7 (Table 26.3) equals or exceeds pollution hazard for roof 0.2 / 0.2 / 0.05 and driveway/parking 0.5 / 0.4 / 0.4 (Table 26.2) across TSS, metals and hydrocarbons — single stage sufficient. Raintaina filters + silt trap add source control. Foul separately controlled (BS EN 12566-3 + tertiary filter, GBR, NRV + penstock).	Addressed
Noted. Treated-effluent discharge to be registered under the EA General Binding Rules (≤ 5 m ³ /day; 0.9 m ³ /day proposed) before first occupation — separate from planning.	Noted
Noted. Ordinary Watercourse Consent (s.23 Land Drainage Act 1991) to be obtained from WSCC LLFA for the outfall works and ditch re-grade before those works — separate from planning.	Noted
Noted. Rainwater harvesting for non-potable use to be considered at detailed design; the tanked permeable-pavement strategy already prioritises on-site management. Not mandatory.	Noted