Planning Application Technical Response

Site:	Central Sussex College Queensmere House 49 Queens Road East Grinstead RH19 1BG
LPA Reference:	DM/25/0388
Date Assessed:	03 March 2025

FULL APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	**NPPF Paragraph 165, 173** **PPG Paragraph 051** **SDNSTS S10**	☐Has the Sequential Test been considered?	
		Provide updated information within an amended FRA on; ☐Fluvial flooding from the ordinary watercourse **☒Surface water flow path originating offsite** ☐Groundwater flooding ☐Rainwater surcharged sewer flooding **☒Historic flood information**	**Objection: Please provide information**
		☒ Address concerns that there is not sufficient room within the development boundary to address flood risk mitigation and also achieved the suggested density of the development.	**Objection: Please provide information**
Mitigation not appropriate	**NPPF Paragraph 165, 173 and 180** **PPG Paragraph 004, 023, 037, 041, 042, 043 and 044**	☐Use sequential approach with the following hierarchy. I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed	
		☐The proposal increases the risk of flooding to existing infrastructure, dwellings or property. Mitigation should be reassessed to show how flood risk can be reduced overall.	
		☒ Provide information on safe access and egress to show how the development will be safe for its	**Objection: Please provide information**

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		lifetime. This may include assessment of how proposals will not increase the number of people living and working in areas of flood risk and if there is any additional burden placed on the emergency services. An emergency plan may also form part of this assessment (see www.adeptnet.org.uk).	
Long term sustainability of the development	**NPPF Paragraph 173 and 180 PPG Paragraph 004, 036, 061, 068 and 069**	☐Provide site specific ordinary watercourse or surface water flow path modelling.	
		☒ Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	**Objection: Please provide information**
		☒Include evidence of appropriate freeboard to finished floor levels from the design flood level.	**Objection: Please provide information on a suitable plan.**
		☒Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	**Objection: Please provide information (45%)**
		☒Use up to date FEH2022 rainfall data for all design flood events.	**Objection: Please provide information (Current calcs use FSR)**
		☐ Provide an easement of 3 m from the top bank of any watercourse is required for maintenance.	

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		☐ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see West Sussex LLFA website).	
How does the site currently drain?	**NPPF Paragraph 175** **PPG Paragraph 059** **SDNSTS S1, S2, S3, S4, S5, S6**	**☒Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.**	**Objection: Please provide further information.**
		☒Greenfield runoff rates and volumes are missing or need to be recalculated (incorrect input parameters).	**Objection: Please use up to date parameters FEH22**
		☒Pre-development brownfield runoff rates are missing or need to be recalculated (incorrect input parameters).	**Objection: Please provide information**
		☒Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	**Objection: Please provide information.**
		☒Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	**Objection: Please provide information.**
Where will the site drain to?	**NPPF Paragraph 175** **PPG Paragraph 055, 056, 059, 060, 061, 062 and 063**	**Drainage location hierarchy has not been followed, further information is required on;** **☒ evidence why rainwater reuse can't be included**	**Objection: Please provide information.**

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	SDNSTS S12, 13 and S14	☐ Source control and interception has not been provided by the provision of vegetated SuDS.	
		☐Infiltration proposals – re Groundwater Source Protection Zone I restrictions.	
		☐Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	
		☐Surface water sewer – no in principle agreement from owner of the asset.	
		☐ Combined sewer – no in principle agreement from owner of the asset.	
		☐ In principle objection - proposing to connect surface water runoff to foul sewer.	
		☐ Detailed justification required why the application cannot be drained via gravity and a pump is required.	
		☐ Full impact assessment of failure of a pumped system and emergency procedures to store 24 hours of water is required.	

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		☐ Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	
Are the 4 pillars of SuDS provided and are they multifunctional?	**NPPF Paragraph 175** **PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063**	☒ **The application must provide water quantity benefits in open, at the surface or above ground SuDS.**	**Objection: Please provide information.**
		☒ **The application must provide water quality benefits.**	**Objection: Please provide information.**
		☒ **Appropriate water quality assessment is absent / incorrect.**	**Objection: Please provide information**
		☐ Additional water quality treatment using surface SuDS is required due to the sensitivity of the discharge location (including groundwater, designated surface watercourses or deep infiltration features).	
		☒ **The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted).**	**Objection: Please provide information.**
		☒ **The application must provide amenity benefits or demonstrate why this is not achievable (lack of space will not be accepted).**	**Objection: Please provide information**

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How will the site drain without adversely effecting flood risk elsewhere?	**NPPF Paragraph 173, 175** **SDNSTS S2, S3, S4, S5, S6**	☐ The most precautionary infiltration rate should be used in the design of the attenuation feature.	
		☐ Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	
		☐ Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	
		☐ Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	
		☐The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	
		☐ Proposed discharge rates and volumes are greater than greenfield with no justification.	
		☐ Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	

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		☐ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	
		☐ Proposed discharged rates would increase flood risk elsewhere and need to be re-assessed.	
		☐ A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	
		☐ How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	
		☐ A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	
		☒ **Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.**	**Objection: Please provide information. (45%)**
		☐ Calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	

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		☒ **Use up to date FEH2022 rainfall parameters in any modelling scenarios.**	**Objection: Please provide information.**
Location of SuDS		☒ **Drawings need to show all the drainage features (storage and conveyance) with labels the same as those in supporting calculations.**	**Objection: Please provide an updated drainage layout.**
		☒ **Drawings need to show the final design (but not construction issue or preliminary issue).**	**Objection: Please provide an updated drainage layout.**
		☐ Cross sections and long sections of all the network and structures such as ponds, basins and swales.	
What is the impact of flood risk on the development?	**NPPF Paragraph 175** **SDNSTS S7, S8, S9, S10 and S11**	**Updated supporting calculations required to show;**	
		☒ **revised modelling calculations to use a CV value of 1.**	**Objection: Please provide network drainage calculations including this.**
		☒ **50% AEP rainfall event does not surcharge in the drainage network.**	**Objection: Please provide network drainage calculations including this .**
		☒ **3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.**	**Objection: Please provide network drainage calculations including this.**

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		☒ **1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water (e.g. pumping station or substation) within the development boundary.**	**Objection: Please provide network drainage calculations including this .**
		☒ **the appropriate climate change allowance must be included.**	**Objection: Please use 45% allowance for climate change.**
		Additional information is required showing; ☒ **above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change must be shown on a drawing with proposed external ground levels and proposed finished floor levels of buildings**	**Objection: Please provide an updated drainage layout showing the location and depth of flooding.**
		☒ **above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change should be designed to be held in the least vulnerable areas of the site e.g. open space.**	**Objection: Please provide an updated drainage layout showing the location and depth of flooding.**
		Flood resistance and resilience must be shown to be included in the design. ☒ **A minimum of 300mm must be provided between any design flood event and the finished ground floor level.** ☒ **A minimum of 150mm above external ground levels and show that they are sloping away from vulnerable areas such as doorways.**	**Objection: Please provide.**

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		☒ **Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as highways or car parks**	**Objection: Please provide.**
		☐ ½ drain down times need to be submitted and show that they are within 24 hours (or within 48 hours for features that are lined e.g. lined tanks or lined basins).	
		☐ Any drainage network showing storage features with ½ drain down time greater than the 24 hours (or 48 hours for lined structures) must be redesigned to show how it can meet this standard or be increased in size to accommodate a subsequent storm event of 3.33% plus climate change allowance.	
		☐ The drainage calculations must be shown to include a surcharged outfall to a watercourse or sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.	
How will the drainage and watercourse features be	**NPPF Paragraph 175** **PPG Paragraph 055, 057 and 058**	☐ Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	

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managed and maintained?	**SDNSTS S10, S11, S12, S13 and S14**	☒ **A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse will appropriate pollution measures.**	**Objection: Please provide.**
		☐ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	
		☐ Vehicular access route and off-road parking needs to be provided to ponds, basins and swales.	
		☐ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse).	

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		☐ Due to the likely long duration build out time (including phased development proposals), a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices	
		☐ As it is a phased development, a surface water management and construction phasing plan is required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which is relies on will be constructed prior to any housing or commercial development.	
Other		☐ Bespoke advice	

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