

P269 UPDATED FILE NOTE 4th July 2025 – Response notes against comments raised by Flood Risk and Drainage Team in respect of Discharge of Condition 10 submission on planning consent DM/23/2039

Comments from LLFA and I have provided responses in red next to each comment, I would like to mention that the comments raised are a bit concerning, as it was my understanding the FRA has been reviewed and approved.

Surface Water

It is proposed for permeable paving and storage tanks to be utilised to discharge surface water from the site. This is acceptable in principle. **Thank you**

1. A CV value of 1 and a climate change allowance of 45% should be utilised.

Calculations have been re-run with 45% over the 40% and there was some minor flooding at the head of one of the runs (0.06m³) which is an acceptable amount. It should be noted that this is a brownfield site, and we have provided betterment over the existing scenario and we have considerably reduced the risk of surface water flooding in comparison to the existing site.

West Sussex LLFA Policy for Management of Surface Water does make reference to a CV of 1.0 however we feel this is excessive, not all of the surface run-off will find its way into the drainage system. We would challenge that the CV of 0.85 that was used in the approved FRA calculations is appropriate.

2. Details of pollution mitigation for surface water runoff in line with CIRIA SuDS Guidance should be provided.

This information already has been provided within Stantec's FRA.

3. The discharge rate should be as close to the greenfield runoff rate for the area of the site being attenuated as feasible.

Proposed discharge rate used is in accordance with FRA

4. As the flow control from the site is downstream of a ditch and the pond, the plan area of any ditches leading into the pond and the pond itself should be taken into account within the strategy to confirm there is sufficient capacity within the system.

We understand that this query relates to considering the surface area of the ditch and pond and how much rainfall is captured directly by this surface area. Calculations provided in the FRA and SuDS design were not queried during the application. Direct rainfall into the ditch will be limited due to tree canopies. The Pond is circa 280m² There is a limited tolerance for direct rainfall. Please see note against item 6. - freeboard.

5. It should be demonstrated that the existing outfall pipework being retained is adequately sized for both the discharge from the land drain and the pond.

The calculations are based on this. We would be happy to offer a verification report post drainage works to record condition of existing drain and any repair work that may be found necessary.

6. As the pond is being utilised as part of the drainage strategy, it should be demonstrated that there is a 300mm freeboard.

Given the limited depth within the existing network, a 300mm freeboard was never achievable, especially as the existing pond has always been a wet pond. Our initial calcs (40%CC) had a water level of 22.287mAOD within the basin, whereas the updated calculations have a water level of 22.315mAOD. The top of bank level is 22.350mAOD. Given that the existing pond has ecological factors, and the relatively shallow nature of the site, being able to achieve 300mm for a wet pond is not achievable without further lifting of the bank and site levels.

7. Linear drains (or similar) should be located at all low points across the site.

Noted, this has been provided.

8. Details of how maintenance and access will be managed for the watercourse should be included within a Maintenance and Management Plan.

I have added a comment on access in the SUDS Maintenance statement.

9. Confirmation of any permissions required to undertake works within the watercourse.

The only work that is within the watercourse is the extension of the culverted section beneath the site exit point.

Foul Water

It is proposed for foul water to discharge into a public sewer. Although this is considered acceptable in principle, evidence of communication with Southern Water should be provided.

Application to Southern Water has been made. Copy email dated 9th June 2025 attached to confirm application is progressing.

Please note that that surface and foul water drainage strategy should be based on the latest approved plans from DM/23/2039.

Could we simply revert to the drainage design drawing contained within the approved FRA? Copy attached.