

PLANNING APPLICATION CONSULTATION RESPONSE

APPLICATION DETAILS

Application Number	DM/23/2610
Response Date	2023-11-02
Site Location	Land at Grid Ref 531084 125590, Longacre Crescent, Cuckfield
Development Description	Residential development of 55 dwellings with vehicular and pedestrian access; car parking; open space, play space; landscaping and all other associated works
Recommendation¹	No objection subject to conditions

FLOOD RISK

The application is supported by a combined flood risk assessment and drainage strategy report (Odyssey, 23-148, Oct 2023). The flood risk assessment element of the report meets national and local policy and guidance requirements. It confirms flood risk from all sources is very low on much of the site, with all residential development located in areas of very low flood risk.

The flood risk and drainage team have no objection to the proposed development on flood risk grounds.

SEWERS ON SITE

The Southern Water public sewer map does not show any public sewers located within the redline boundary of the site.

There may be sewers located on the site not shown on the plan which are now considered public sewers. Any drain which serves more than one property or crosses into the site from a separate site may be considered a public sewer. Advice in relation to this situation can be found on the relevant water authority's website.

SURFACE WATER DRAINAGE

INFORMATION

Surface water drainage will ultimately need to be designed to meet the latest national and local drainage policies. The drainage system will need to consider climate change, the allowances for which should be based on the [latest climate change guidance](#) from the Environment Agency.

APPLICATION SPECIFIC COMMENT

The BGS infiltration potential map shows the site to be in an area with both high and low infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways may be possible in some areas of the site. To ensure the drainage hierarchy is followed this will need to be investigated and considered as part of the detailed drainage design. This should include infiltration testing on site as part of detailed drainage design.

It is proposed that the development will manage surface water via infiltration before discharging at a controlled rate into an adjacent watercourse. The drainage strategy includes two discharge location options, one to the east and one to the west of the site.

¹ In line with guidance from the Planning Department the Flood Risk and Drainage Team, where considered appropriate, utilise conditions to address detailed drainage design and detailed design of flood mitigation measures.

The drainage strategy does not appear to include sufficient source control techniques or consider the use of infiltration drainage. Both elements should be considered as part of the detailed drainage design to avoid an 'end of pipe' attenuation solution which is not considered to be the best sustainable drainage approach. We would also advise that the applicant consider ecology, biodiversity, amenity and existing surface water flood flow routes during subsequent drainage design stages.

The drainage strategy has shown that in principle, the proposed development could provide surface water drainage on site. Information into our general requirements for detailed surface water drainage design is included within the 'General Drainage Requirement Guidance' section. This level of information will be required to address the recommended drainage condition.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required in relation to climate change etc prior to undertaking detailed design.

FOUL WATER DRAINAGE

It is proposed that the development will discharge foul water drainage to an existing public foul sewer. The drainage strategy states that whilst most of the site can drain via gravity a package pumping station will be required to drain the south-east of the site. The location of this pumping station is shown on the proposed site plans.

The proposed foul water drainage approach is considered acceptable in principle, and subject to detailed design. Information into our general requirements for detailed foul water drainage design is included within the 'General Drainage Requirement Guidance' section.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required prior to undertaking detailed design.

CONDITION RECOMMENDATION

C18F - MULTIPLE DWELLINGS/UNITS

The development hereby permitted shall not commence unless and until details of the proposed foul and surface water drainage and means of disposal have been submitted to and approved in writing by the local planning authority. No building shall be occupied until all the approved drainage works have been carried out in accordance with the approved details. The details shall include a timetable for its implementation and a management and maintenance plan for the lifetime of the development which shall include arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. Maintenance and management during the lifetime of the development should be in accordance with the approved details.

Reason: To ensure that the proposal is satisfactorily drained and to accord with the NPPF requirements, Policy CS13 of the Mid Sussex Local Plan, Policy DP41 of the Pre-Submission District Plan (2014 - 2031) and Policy ...'z'... of the Neighbourhood Plan.

SURFACE WATER DRAINAGE VERIFICATION REPORT

No building is to be occupied, or brought into use, until a Verification Report pertaining to the surface water drainage system, carried out by a competent Engineer, has been submitted to the Local Planning Authority. The Verification Report shall demonstrate the suitable operation of the drainage system such that flood risk is appropriately managed, as approved

by the Lead Local Flood Authority. The Report shall contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets, and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; and topographical survey of 'as constructed' features. The Verification Report should also include an indication of the adopting or maintaining authority or organisation.

Reason: To ensure that the constructed surface water drainage system complies with the approved drainage design and is maintainable.

For and on behalf of the Flood Risk and Drainage Team
Mid Sussex District Council
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GENERAL DETAILED DRAINAGE DESIGN REQUIREMENT GUIDANCE

Mid Sussex District Council's flood risk and drainage requirements are based on relevant national and local policies and guidance.

SURFACE WATER DRAINAGE

Finalised detailed surface water drainage design is required to be submitted and approved prior to construction starting on site. The design should be based on the [Environment Agency's latest climate change allowances](#) and follow the latest [West Sussex Lead Local Flood Authority Policies and Guidance](#).

The use of pumped surface water drainage is not considered to be sustainable and therefore would not be considered an appropriate means of managing surface water as part of a development.

The locating of attenuation, detention, or infiltration devices (including permeable surfacing) within flood extents is not acceptable, this includes areas of increased surface water flood risk.

Drainage calculations should utilise a CV value of 1.

Table 1 overleaf sets out a list of information the detailed surface water drainage design should include. Developers are encouraged to complete the table and provide as a cover page to future drainage design submissions.

FOUL WATER DRAINAGE

Finalised detailed foul water drainage design is required to be submitted and approved prior to construction starting on site. The use of public foul sewer connection should always be prioritised over non-mains drainage options.

The use of non-mains foul drainage should consider the latest [Environment Agency's General Binding Rules](#).

The Environment Agency have advised that any existing septic tank foul drainage systems that are found to not comply with the latest Binding Rules will need to be replaced or upgraded.

Table 2 overleaf sets out a list of information the detailed foul water drainage design should include. Developers are encouraged to complete the table and provide as a cover page to future drainage design submissions.

Table 1: Detailed **surface water** drainage design requirement summary sheet

Requirement	Information	Location of information / drawing number
<i>For all designs</i>		
Greenfield runoff rate details for the area to be drained (using FEH or a similar approved method)		
On-site infiltration test results		
Plans / details of areas to be drained based on finalised development plans		
Calculations showing the system has been designed to cater for the 1 in 30 with climate change and 1 in 100 with climate change storm events		
Detailed drainage plans, including invert levels and pipe diameters, showing entire drainage system		
Maintenance and management plan ²		
<i>For soakaways</i>		
Sizing calculations (to cater for 6-hour, 1 in 100-year plus climate change event)		
Half drain time (<24 hours)		
Construction details		
<i>For discharge to watercourse</i>		
Discharge rate (1 in 1 or QBar Greenfield rate for drained area) ³		
Outfall location and construction details		
Attenuation sizing calculations (to cater for 1 in 100-year plus climate change event ⁴)		
<i>For discharge to sewer</i>		
Discharge rates (restricted to 1 in 1 or QBar Greenfield rate for drained area unless otherwise agreed with sewerage provider)		
Discharge location and manhole number		
Outline approval from sewerage provider in relation to connection, discharge rate and connection location ⁵		
Attenuation sizing calculations (to cater for 1 in 100-year plus climate change event ⁶)		

² The scale of this document should reflect the scale of the development and the complexity of the drainage system.

³ If the 1 in 1 or QBar Greenfield runoff rate cannot be achieved, then evidence into why a higher discharge rate has been proposed should be provided as part of the detailed design. Due to improvements in drainage systems the 2l/s minimum will not be accepted without justification.

⁴ If system does not attenuate up to the 1 in 100-year with climate change event, then evidence that the system shall not increase flood risk on or off site shall be required.

⁵ Formal approval via S106 etc is not required.

⁶ If system does not attenuate up to the 1 in 100-year with climate change event, then evidence that the system shall not increase flood risk on or off site shall be required.

Table 2: Detailed **foul water** drainage design requirement summary sheet

Requirement	Summary	Location of information / drawing number
<i>For all designs</i>		
Plans showing entire drainage system, including invert levels, pipe diameters, falls and outfall/connection location		
Foul flow calculations and confirmation proposed system is sized appropriately		
<i>For connection to main foul sewer</i>		
Discharge location and manhole number		
Evidence of communication with Water Authority regarding connection ⁷		
<i>For non-mains system with drainage field</i>		
Evidence of permeability (infiltration) test results specific to treated effluent drainage fields		
Evidence that either: a) The system meets latest General Binding Rules, or b) An Environmental Permit application is to be submitted		
<i>For non-mains system with discharge to open water</i>		
Evidence that either: a) The system meets latest General Binding Rules, or b) An Environmental Permit application is to be submitted		
Outfall location and construction details		

⁷ Formal approval via S106 etc is not required.