

PLANNING APPLICATION CONSULTATION RESPONSE**APPLICATION DETAILS**

Application Number	DM/22/2542
Planning Officer	Deborah Lynn
Flood Risk and Drainage Officer	Natalie James
Response Date	2022-08-22
Site Location	Apple Barn, Plawhatch Lane, Sharpthorne
Development Description	Change the use of the existing structure and provision of an artist's studio and associated works.
Recommendation	Further information required

The consultation response is based on the understanding that this is an application for the development of a new non-residential commercial premises which is not associated with any existing development in the area.

The flood risk and drainage team also acknowledge that this is a retrospective application covering the entire development on site. Therefore, the recommendation of pre-commencement planning conditions is not considered appropriate, and all details are required at this stage of planning. The consultation reflects this approach.

FLOOD RISK

The site is in flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers). The site is shown to be at very low surface water flood risk.

There are no historic records of flooding occurring on this site or the immediate area surrounding the site. A lack of historic records of flooding does not mean that flooding has never occurred, instead, that flooding has just never been reported.

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 is likely to now be considered a public sewer. Advice in relation to this situation can be found on the relevant water authority's website.

SURFACE WATER DRAINAGE

The development is considered a new build non-residential development. As such, the flood risk and drainage team advise the development should comply with drainage design guidance as set out under planning. The development should manage surface water drainage up to and including the 1 in 100-year storm event, plus an allowance for climate change. Information into our general requirements for detailed surface water drainage design is included within the 'General Drainage Requirement Guidance' section. Due to the retrospective nature of the application this detailed design information is required at this stage of planning.

The application is supported by a Foul Sewage and Surface Water (Drainage) Report. This report appears to suggest that surface water drainage shall be provided by an existing soakaway located on the site which will be fed via French drains and a pumped surface

water system (to address the basement level access). Excess water is proposed to be utilised within a rainwater harvesting tank.

The proposed surface water drainage approach and the information submitted is not considered detailed drainage design. Table 1 (in General drainage requirement guidance) of this response sets out the level of information required at detailed design stage.

FOUL WATER DRAINAGE

Due to the new build nature of the development information into how foul water drainage shall be provided for the development will be required. Information into our general requirements for detailed foul water drainage design is included within the 'General Drainage Requirement Guidance' section. Due to the retrospective nature of the application this detailed design information is required at this stage of planning.

The application is supported by a Foul Sewage and Surface Water (Drainage) Report. This report states that foul water drainage shall be managed via a package treatment plant. Treated foul effluent is proposed to discharge either into a soakaway or directed to the ditch at Plawhatch Lane.

We would advise the applicant that non-main foul drainage solutions should consider the Environment Agency's General Binding rules. If the design will not meet with the binding rules, then evidence that an Environmental Permit has been applied for should be provided along side the detailed design.

The information submitted does not meet with the detailed drainage design requirement. Table 2 (in General drainage requirement guidance) of this response sets out the level of information required at detailed design stage.

GENERAL DRAINAGE 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 Policy for the Management of Surface Water

(<https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/flood-reports-projects-and-policies/>).

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.

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 (<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water>).

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 drainage design requirements – surface water

Requirement	Location of information within submitted design
<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 100-year storm event, plus appropriate allowance for climate change	
Detailed drainage plans, including invert levels and pipe diameters, showing entire drainage system	
Maintenance and management plan ¹	
<i>For soakaways</i>	
Sizing calculations (to cater for 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) ²	
Outfall location and construction details	
Attenuation sizing calculations (to cater for 1 in 100-year plus climate change event)	
<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 ³	
Attenuation sizing calculations (to cater for 1 in 100-year plus climate change event)	

¹ The scale of this document should reflect the scale of the development and the complexity of the drainage system.

² 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. Due to improvements in drainage systems the 2l/s minimum will not be accepted without justification.

³ Formal approval via S106 etc is not required.

Table 2: Detailed drainage design requirements – foul water

Requirement	Location of information within submitted design
<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 ⁴	
<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 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 b) An Environmental Permit application is to be submitted	
Outfall location and construction details	

⁴ Formal approval via S106 etc is not required.