

#	Topic	Related Policy or Standard	Applicant Action required	LLFA comment	HOP Response
1	Mitigation not appropriate	NPPF Paragraph 165, 173 and 180 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044	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	Objection: Please provide information.	Paragraph 3.6 of the FRA states that no loss of flood storage occurs due to the proposals resulting in no increase in fluvial flood risk outside the site. Within the site, FFLs are above the 100 year plus 105% flood level as discussed updated Paragraphs 4.4-4.7 of the FRA.
			Provide information on safe access and egress to show how the development will be safe for its 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).	Objection: Please provide information.	Please refer to the updated Paragraphs 4.4 to 4.7 of the FRA detailing proposed FFL's and egress routes.
3	Long term sustainability of the development	NPPF Paragraph 173 and 180 PPG Paragraph 004, 036, 061, 068 and 069	Provide an easement of 3 m from the top bank of any watercourse is required for maintenance.	Objection: Please show on a plan.	No open watercourses are in the vicinity of the site. The culverted watercourses are shown on the drainage plan which has been updated to identify these pipes and highlight the greater than 3m easements provided.
			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).	Objection: Please provide information.	The watercourses are culverted. The 8m easement is appropriate for open watercourses where silt and vegetation management activities are anticipated and is therefore not applicable to this scenario.
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5	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: No intrusive testing to rule out feasibility of Infiltration within discharge Hierarchy	Within this section of comments titled 'How does the site currently drain?' Paragraph 5.7 of the FRA notes that a CCTV survey has confirmed the site currently drains to the surface water culvert via channel drains and downpipes. For the proposed drainage considerations, please see Point 6 below.
6	Where will the site drain to?	NPPF Paragraph 175 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14	Drainage location hierarchy has not been followed, further information is required on; evidence why rainwater reuse can't be included	Objection: Please provide information.	For the proposed scenario, soakaways are not feasible due to the lack of space available on the site to locate 5m from buildings. Furthermore, the presence of culverted watercourses and surface water flow paths adjacent to the site indicates that infiltration would not be feasible. Rainwater harvesting cannot be considered within the drainage hydraulic design as it cannot reliably provide a storage volume when needed. It can be incorporated into the architectural proposals but would not form part of the drainage proposals.
7			Source control and interception has not been provided by the provision of vegetated SuDS.	Objection: Please provide information.	As the proposed building fills most of the site, there is limited space for vegetation. Two vegetated planters are proposed to the north and south of the site which will intercept the rainfall incident on these areas, reducing the overall impermeable area of the site, however the areas are limited and it is not feasible for them to be used to create a SuDS feature of any significant benefit.
8			Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	Informative: please provide any agreements in principle.	Please See Figure 3.4 in the FRA for the wider watercourse connectivity. The existing private surface water connection to the culverted watercourse is to be reused. No additional access, outfalls or agreements are required.

9	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.	Paragraph 059, Point 6 of the PPG does not require the use of above ground water quantity benefitting SuDS. They would be incorporated into the proposals, if it were feasible, however the PPG asks for clear evidence of why it is not feasible. The layout proposals are clear evidence that there is no space available as discussed in Point 7.
10			The application must provide water quality benefits.	Objection: Please provide information.	Please see updated paragraphs 5.16 and 5.20 regarding the added pollution management proposals.
11			The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Objection: Please provide information.	We are informed that the landscape proposals included as part of the scheme achieve a 27% Bioiversity Net Gain as submitted under the Biodiversity Net Gain Assessment. The biodiversity requirements of the site do not have relevance to the drainage scheme proposals.
12	Location of SuDS		Drawings need to show the final design (but not construction issue or preliminary issue).	Objection: Please provide an updated drainage layout.	Further detail is now provided on the updated drawings in Appendix A.
13			Cross sections and long sections of all the network and structures such as ponds, basins and swales.	Objection: Please provide.	Please refer to the details on Drawing 9001 in Appendix A of the FRA.
14	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.	Updated calculations can be found in Appendix G of the FRA.
15	How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 175 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Objection: Insufficient Information. Solution and site specific proposals at Full Application	An updated proposed maintenance schedule is provided in Appendix H of the FRA. This now includes all SuDS features proposed, the maintenance tasks and their responsibility.

16	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.	The management of surface water runoff during construction is for the contractor to manage once they have considered the required construction activates. As we are at planning stage, a contractor has not yet been identified. We expect that this would be conditioned for the appointed contractor to manage in due course.
17	Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	Objection: Please update any drawings.	Easements to the foul water sewer to the east of the site are now identified on the drainage plan found in Appendix A of the FRA.
18	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)).	<i>(Assumed objection - no comment)</i>	Please refer to the responses to Points 3 and 4.