

## PLANNING APPLICATION CONSULTATION RESPONSE

### APPLICATION DETAILS

Application Number	DM/20/2877
Planning Officer	Andy Watt
Flood Risk and Drainage Officer	Natalie James
Response Date	27 August 2020
Site Location	Land north of Turners Hill Road, Turners Hill
Development Description	Outline application for single 'chapel' crematorium with a single abated cremator and natural burial site with associated access, car parking, landscaping and drainage
Recommendation	<b>No objection subject to conditions Advice</b>

### INITIAL COMMENTS

The Flood Risk and Drainage Team acknowledges that this is an outline application with all matters reserved except for access. However, our comments are based on the Flood Risk Assessment and Drainage Strategy for Planning report (Unda, August 2020) which has been submitted in support of the outline application.

### FLOOD RISK

The site is within flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers). Most of the site is not within an area identified as having possible surface water (pluvial) flood risk. However, some areas of increased surface water flood risk are located on site.

There are not any historic records of flooding occurring on this site and in this area. This does not mean that flooding has never occurred here, instead, that flooding has just never been reported.

The application is supported by a Flood Risk Assessment and Drainage Strategy for Planning report. This report states that the flood risk to the proposed development is very low. The report also confirms that the type of development is considered acceptable in flood zone 1.

### SURFACE WATER DRAINAGE

The Flood Risk Assessment and Drainage Strategy for Planning report identifies that infiltration is likely to be possible on site. However, due to the proposed use of the site the report states that infiltration is not suitable. Therefore, discharge of surface water to an existing watercourse within the site has been proposed.

The report states that attenuation will be provided within a pond and tanked permeable paving. Surface water discharge shall be limited to the 1 in 1-year Greenfield runoff rate for the positively drained area for all events up to and including the 1 in 100-year event with an additional 40% allowance for climate change.

The surface water drainage strategy provided within the report is comprehensive, however it is based on the outline development plan. As such a detailed drainage design will be required at a later stage in planning utilising the finalised development layout plans.

Further information into our general requirements for surface water drainage is included within the 'General Drainage Requirement Guidance' section.

## **FOUL WATER DRAINAGE**

The Flood Risk Assessment and Drainage Strategy for Planning report does not cover foul water drainage and the application form states the means of managing foul drainage is unknown.

Due to the scale of the development it is considered that foul water drainage could be achieved on the site and details of this can be covered by a planning condition.

Further information into our general requirements for foul water drainage is included within the 'General Drainage Requirement Guidance' section.

## **SUGGESTED CONDITIONS**

### ***FOUL AND SURFACE WATER DRAINAGE***

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 brought into use 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.

## **GENERAL DRAINAGE REQUIREMENT GUIDANCE**

### **SURFACE WATER DRAINAGE**

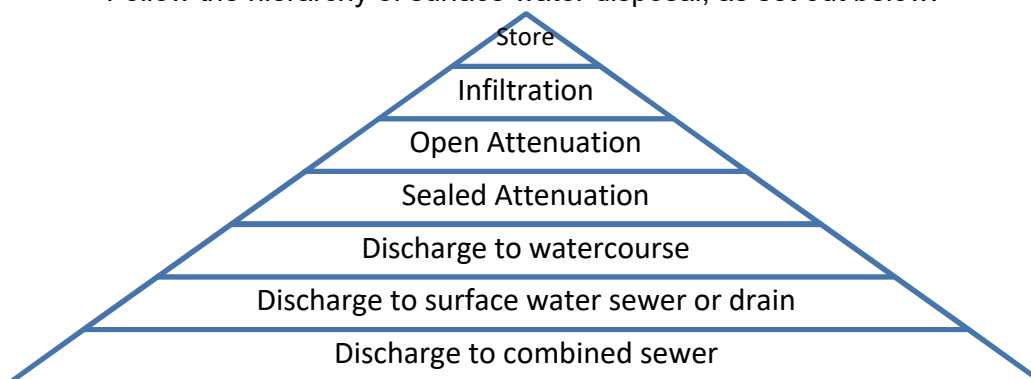
Proposed development will need to fully consider how it will manage surface water run-off. The hierarchy of surface water disposal will need to be followed and full consideration will need to be made towards the development catering for the 1 in 100-year storm event plus extra capacity for climate change. Climate change allowances should be in line with the Environment Agency's climate change allowance recommendations.

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.

Multiple dwellings / multiple unit development will need to provide a maintenance and management plan that identifies how the various drainage systems will be managed for the lifetime of the development, who will undertake this work and how it will be funded.

The proposed development drainage will need to:

- Follow the hierarchy of surface water disposal, as set out below.



- Protect people and property on the site from the risk of flooding
- Avoid creating and/or exacerbating flood risk to others beyond the boundary of the site.
- Match existing Greenfield rates and follow natural drainage routes as far as possible.
- Calculate Greenfield rates using FEH or a similar approved method. SAAR and any other rainfall data used in run-off storage calculations should be based upon FEH rainfall values.
- Seek to reduce existing flood risk.
- Fully consider the likely impacts of climate change and changes to impermeable areas over the lifetime of the development.
- Consider a sustainable approach to drainage design considering managing surface water at source and surface.
- Consider the ability to remove pollutants and improve water quality.
- Consider opportunities for biodiversity enhancement.

## **FOUL WATER DRAINAGE**

This proposed development will need to fully consider how it will manage foul water drainage. The preference will always be to connect to a public foul sewer. However, where a foul sewer is not available then the use of a package treatment plant or septic tank should be investigated.

The use of non-mains foul drainage should consider the Environment Agency's General Binding Rules. We would advise applicants that 'General Binding Rules 2020' came into force as of 1<sup>st</sup> January 2020.

The Environment Agency have advised that any existing septic tank foul drainage systems that are found to not comply with the 2020 Binding Rules will need to be replaced or upgraded. As such any foul drainage system which proposed to utilise a septic tank will need to comply with the new 2020 rules. Guidance into the General Binding Rules can be found on the government website (<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water>)

**FLOOD RISK AND DRAINAGE INFORMATION FOR PLANNING APPLICATIONS**

The level of drainage information necessary for submission at each stage within the planning process will vary depending on the size of the development, flood risk, site constraints, proposed sustainable drainage system etc. The table below provides a guide and is taken from the [Practice Guidance for the English non-statutory SuDS Standards](#). Additional information may be required under specific site conditions or development proposals.

PRE-APP	OUTLINE	FULL	RESERVED	DISCHARGE	DOCUMENT SUBMITTED
✓	✓	✓			Flood Risk Assessment / Statement (checklist)
✓	✓	✓			Drainage Strategy / Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of third-party agreement for discharge to their system (in principle / consent to discharge)
		✓		✓	Maintenance program and on-going maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood and drainage design drawings
		✓	✓	✓	Full Structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration results
		✓	✓	✓	Detailing landscaping details
		✓	✓	✓	Discharge agreements (temporary and permanent)
		✓	✓	✓	Development Management & Construction Phasing Plan

**USEFUL LINKS**

[Planning Practice Guidance – Flood Risk and Coastal Change](#)

[Flood Risk Assessment for Planning Applications](#)

[Sustainable drainage systems technical standards](#)

[Water.People.Places.- A guide for master planning sustainable drainage into developments](#)

[Climate change allowances - Detailed guidance – Environment Agency Guidance](#)

[West Sussex Lead Local Flood Authority Policy for the Management of Surface Water](#)

Further guidance is available on the Susdrain website at <http://www.susdrain.org/resources/>

**INFORMATION REQUIREMENTS**

The following provides a guideline into the specific information required based on the type of development, location and type of surface water drainage management proposed. Multiple lists may be relevant to a single application.

DESCRIPTION OF DEVELOPMENT	INFORMATION REQUIRED
<p>Located in Flood Zone 2 or 3.</p> <p>Located in Flood Zone 1 and greater than 1 hectare in area.</p> <p>Located in an area where a significant flood risk has been identified (including increased surface water flood risk)</p>	<ul style="list-style-type: none"> <li>Flood Risk Assessment which identified what the flood risks are and how they will change in the future. Also, whether the proposed development will create or exacerbate flood risk, and how it is intended to manage flood risk post development.</li> </ul>
<p>Multiple plot development</p>	<ul style="list-style-type: none"> <li>A Maintenance and Management Plan that shows how all drainage infrastructure will be maintained so it will operate at its optimum for the lifetime of the development. This will need to identify who will undertake this work and how it will be funded. Also, measures and arrangements in place to ensure perpetuity and demonstrate the serviceability requirements, including scheduled maintenance, inspections, repairs and replacements, will need to be submitted. A clear timetable for the schedule of maintenance can help to demonstrate this.</li> </ul>
<p>Public sewer under or adjacent to site</p>	<ul style="list-style-type: none"> <li>Evidence of approvals to build over or within proximity to public sewers will need to be submitted.</li> </ul> <p><u>Advice</u>                      Consultation will need to be made with the sewerage undertaker if there is a Public Sewer running under or adjacent to the proposed development.</p> <p>Building any structure over or within proximity to such sewers will require prior permission from the sewerage undertaker. Any development within 8m of a sewer will require consultation.</p>

DESCRIPTION OF DEVELOPMENT	INFORMATION REQUIRED
<p>MSDC culvert under or adjacent to site</p>	<ul style="list-style-type: none"> <li>• Evidence of approvals to build over or within proximity to MSDC assets will need to be submitted.</li> </ul> <p><u>Advice</u>                      Consultation will need to be made with Mid Sussex District Council if there is a MSDC owned culvert running under or adjacent to the proposed development. Consultation should be made where such an asset is within 8m of any development.</p> <p>Building any structure over or within proximity to such culverts will require prior permission from Mid Sussex District Council. Normally it will be required that an “easement” strip of land, at least 5 to 8 metres wide, is left undeveloped to ensure that access can be made in the event of future maintenance and/or replacement.</p> <p>This matter can be discussed with Mid Sussex District Council Flood Risk and Drainage Team via <a href="mailto:drainage@midsussex.gov.uk">drainage@midsussex.gov.uk</a>.</p>
<p>Watercourse on or adjacent to site</p>	<ul style="list-style-type: none"> <li>• Plan showing watercourse maintenance strip</li> </ul> <p><u>Advice</u>                      A watercourse maintenance strip of 5 to 8 metres is required between any building and the top-of-bank of any watercourse that may run through or adjacent to the development site.</p>

**INFORMATION REQUIREMENTS – SURFACE WATER DRAINAGE**

<p><b>PROPOSED SURFACE WATER DRAINAGE METHOD</b></p>	<p><b>INFORMATION REQUIRED</b></p>
<p>Infiltration  e.g. Soakaways</p>	<ul style="list-style-type: none"> <li>• Percolation test results</li> <li>• Sizing calculations, details and plans to demonstrate that the soakaway system will be able to cater for the 1 in 100-year storm event plus have extra capacity for climate change. Climate change allowances for residential development is 40% and for commercial development is 30%.</li> <li>• Calculations which show the proposed soakaway will have a half drain time of 24 hours or less.</li> </ul>
<p>Outfall to watercourse</p>	<ul style="list-style-type: none"> <li>• Evidence discharge rate will be restricted in accordance with <a href="#">West Sussex Lead Local Flood Authority Policy for the Management of Surface Water</a></li> </ul> <p><u>Advice</u> You cannot discharge surface water unrestricted to a watercourse.</p> <p>Discharge rates should be restricted to the Greenfield QBar runoff rate for the positively drained area for all events up to and including the 1 in 100-year rainfall event with climate change.</p> <p>If works (including temporary works) are undertaken within, under, over or up to an Ordinary Watercourse, then these works are likely to affect the flow in the watercourse and an <i>Ordinary Watercourse Consent (OWC)</i> may need to be applied for. Guidance into the OWC application process can be found on West Sussex County Council's website at</p> <p><a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/dealing-with-flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/">https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/dealing-with-flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/</a></p> <p>OWC applications can also be discussed and made with Mid Sussex District Council Flood Risk and Drainage Team via <a href="mailto:drainage@midsussex.gov.uk">drainage@midsussex.gov.uk</a>.</p>



<p><b>PROPOSED SURFACE WATER DRAINAGE METHOD</b></p>	<p><b>INFORMATION REQUIRED</b></p>
<p>Outfall to public sewer</p>	<ul style="list-style-type: none"> <li>• Evidence discharge rate will be restricted in accordance with <a href="#">West Sussex Lead Local Flood Authority Policy for the Management of Surface Water</a></li> <li>• Evidence connection and discharge rate has been approved with responsible sewerage undertaker.</li> </ul> <p><u>Advice</u> You cannot discharge surface water unrestricted to a sewer. Discharge of surface water into a foul sewer system is not usually acceptable.</p> <p>Discharge rates should be restricted to the Greenfield QBar runoff rate for the positively drained area for all events up to and including the 1 in 100-year rainfall event with climate change. Unless agreed otherwise with the sewerage provider.</p>
<p>SuDS and attenuation</p>	<ul style="list-style-type: none"> <li>• Evidence any discharge rates will be restricted in accordance with <a href="#">West Sussex Lead Local Flood Authority Policy for the Management of Surface Water</a></li> <li>• Percolation test results</li> <li>• Sizing calculations, details and plans to demonstrate that any infiltration / attenuation will be able to cater for the 1 in 100-year storm event plus have extra capacity for climate change. Climate change allowances for residential development is 40% and for commercial development is 30%.</li> <li>• Calculations which show the proposed soakaway will have a half drain time of 24 hours or less.</li> </ul> <p><u>Advice</u> Written Statement (HCWS 161) - Department for Communities and Local Government - sets out the expectation that sustainable drainage systems will be provided to new developments wherever this is appropriate.</p> <p>You cannot discharge surface water unrestricted to a watercourse or sewer.</p>

