

Response table to WSCC (LLFA) issues raised (extract) to planning application AL/89/24/OUT

Category	Related Policy or Standard	LLFA requirement	LLFA concerns	Designers Response
Where will the site drain to:	NPPF Paragraph 175 PPG Paragraph 055, 056, 059, 060,061,062 and 63 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.	Informative: Please provide consideration of rainwater reuse	Water butts can be included to each house with private garden plot.
		Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	Objection: please provide further information of a plan	Sections 2.7 to 2.10 explains how the existing site drains including a diagram of how the site area connects to the wider network. The existing ditches in t he site are owned by Hanbury and therefore no permissions are required as they have riparian rights. In addition a more detailed explanation of how the local land drainage system operates is provided in Sections 2.25 to 2.26 including plans for clarity. SFRA mapping has been enhanced to show the existing surface water drainage connections.
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	Commitment to the use of SuDS and high-level assessment to include: X water quality ☒ biodiversity ☒ amenity	Objection: Please provide further details	Please refer to pp25 of the submitted Planning Statement. This specifies the approach taken by the scheme which is to deploy SuDS through the site, in alignment with ADC adopted guidance and that wherever possible

				they will achieve dual use, while noting that they are not counted by the Arun SPD towards public open space provision. The final surface water drainage scheme will be secured by way of planning condition – this is an outline planning application – and that will include necessary measures to meet CIRIA guidance including in respect of achievement of satisfactory water quality.
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 173, 175 SDNSTS S2, S3, S4, S5, S6	The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Objection: Please provide evidence for the 100% AEP runoff rate	The modelling software, Infodrainage cannot assess 1 in 1 year events. In substitution 1 in 2 year modelling results are provided. These are considered to be sufficiently robust and WSCC has not sustained objection to their use in recent comparable planning applications. Infodrainage calculations are provided in Appendix 4.
		Proposed discharge rates and volumes are greater than greenfield with no justification.	Objection: The proposed discharge rates are based on the impermeable area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.	The proposed discharge rates are based on greenfield runoff (Qbar). The contributing area is from impermeable areas only, this is explained at Section 5.5 (This was ADC Policy). The assessed discharge rates are lower than the greenfield runoff rate for each sub-catchment.
		Proposed discharge rates include future allowances for climate change	Objection: The proposed discharge rates are based on the impermeable	See answer above.

		and/or urban creep. These must be removed and all calculations resubmitted.	area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.	
		Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	Objection: The proposed discharge rates are based on the impermeable area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.	See answer above.
		Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Objection: Please provide storage volumes for the 3.33% AEP event plus climate change. (45%)	The 1 in 30 yr event is already accommodated by storage designed to attenuate the more significant volumes in a 1:100 year event, plus CC already demonstrated for the site. See sections 5.14 to 5.16 showing the calculated 3.33% AEP event plus climate change. (45%) volumes for each subcatchment. The volumes are also shown on the drainage strategy in Appendix 6.
		Outline drainage modelling calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	Objection: Please provide further details.	For each of the subcatchments the roof and paved areas have been measured. 10% addition for creep was then added. AREA 1 (Road only) Roof area = 0 Paved area= 0.3Ha Combined=0.3Ha No allowance for creep as access road only

				AREA 2 Roof area = 0.7387Ha Paved area= 1.3472Ha Combined=2.0859Ha Creep allowance=0.215Ha Total = 2.3009Ha (2.3Ha) AREA 3 Roof area = 0.0736Ha Paved area= 0.122Ha Combined=0.1956Ha Creep allowance=0.02Ha Total = 0.2156Ha (0.22Ha) NOTE The modelled impermeable area for AREA 3 in the FRA of 0.6Ha is in error. The measured area is 0.22 Ha. This is now corrected and the FRA updated accordingly.
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	Provide an easement of a minimum of 3m from the top bank of any 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 time the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).	Objection: please show on drawings.	Please note; a) This application is submitted in outline for up to 130 dwellings – layout and landscaping are reserved matters at this stage and are not being considered in detail – therefore showing ‘on drawing’ is not suitable as those are likely to change.

				b) Refer to illustrative masterplan supporting application which already shows 130 dwellings accommodated (i.e. maximum amount) with SuDS and adequate maintenance space/areas for watercourses. c) We are happy for this to be covered by way of mention in planning conditions for the detailed drainage scheme.
		A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumption such as the need to discharge to a sewer or watercourse with appropriate pollution measures.	Objection: Please provide information.	There is an assessment on water quality provision in the final design for the proposed development. The application is in outline and therefore even the proposed layout is illustrative, much like the drainage strategy which is based on it. It is common for a Construction Phase Drainage Strategy to be secured by way of planning condition in these cases and that is usually included as part of a Construction Environmental Management Plan.