TN03 – Response to WSCC Objection to DC/25/0403

Site: Stonehouse Farm, Handcross Road, Plummers Plain, West Sussex
Prepared by: Phil Allen MCIWEM C.WEM
Approved by: Neil Jaques
Date: 20 August 2025

84 North Street
Guildford
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1.0 Introduction

1.1 This technical note (TN03) has been prepared in response to West Sussex County Council's (WSCC's) further comments on DC/25/0403. WSCC have requested a final tranche of information to be provided to remove their holding objection.

1.2 WSCC's holding objection and request for further information can be seen in full in Appendix A, but the main points raised by WSCC are listed below:

1. *The Applicant has advised they will be using a fully lined system, which is acceptable to address this point however we will require updated technical drawings with notes confirming this.*
2. *[WSCC require] evidence that methods of source control have been comprehensively explored, for example French drains, rain gardens or boundary swales for tarmacadam hard standing areas. This point has not been addressed in the response, and as SuDS features can affect layout these cannot be conditioned (as per Principle 9). We would suggest the latest national standards are reviewed and if the Applicant is considering any further source control they advise accordingly.*
3. *Further information on the existing surface water drainage network which it is proposed various development proposals will connect to. Please provide details of the connection points/manholes, capacity, pipe diameters etc to ensure there is sufficient resilience within the network to cater for the proposed development.*
4. *Plans showing the entire network up to and including any watercourse connections (existing and proposed), with location headwall details To clarify, we are aware of the existence of the watercourse as the Applicant states, however the location of the connection and the viability of the entire proposed network including this are critical to our approval. We need to be satisfied that all three independent sites have an effective and accessible network now and in perpetuity. If the proposed drainage plan cannot be implemented, this may also affect layout. For these reasons this cannot be conditioned. As per our previous response we need to see a sitewide drainage plan including connection points to any existing ordinary watercourse, topographic levels and the invert levels of any drainage features. Confirmation of easements for connections outside of the red line boundary will be required.*

1.3 Each of the above comments will be discussed and the additional information will be provided, as required, in Section 2.0, below.

2.0 Discussion

2.1 Each of WSCC's comments are addressed/discussed in the order they are listed above. WSCC's comments are highlighted in orange text, followed by Motion's response.

The Applicant has advised they will be using a fully lined system, which is acceptable to address this point however we will require updated technical drawings with notes confirming this

2.2 Please see the drawings in Appendix B, all of which contain a note (clouded red) that states "*All drainage and SuDS features to be fully lined to prevent groundwater ingress*"

[WSCC require] evidence that methods of source control have been comprehensively explored, for example French drains, rain gardens or boundary swales for tarmacadam hard standing areas. This point has not been addressed in the response, and as SuDS features can affect layout these cannot be conditioned (as per Principle 9). We would suggest the latest national standards are reviewed and if the Applicant is considering any further source control they advise accordingly

2.3 We would disagree that the use of source control methods has not been comprehensively explored or that this issue was not suitably addressed in Motion's previous response (TN02). The following was supplied in TN02, which clearly stated the geoenvironmental, topographical and operational constraints on the sites that ultimately determine whether source control methods (such as swales or rainwater gardens) are appropriate.

"*Source control methods have been considered and used where appropriate and have been omitted where inappropriate.*

Stonehouse Business Park and Lot 8 are operational commercial spaces, that need safe, hazard free access for goods vehicles that will be manoeuvring. Hardstanding areas must be robust and clear of hazards. With this in mind, permeable paviours are not appropriate as they are not suitable for heavy goods vehicles turning from lock to lock, as they become loose and unstable under HGV loads. Additionally, amenity features such as rain gardens and bio-retention areas are not suitable where the operational and commercial activities on site require clear, unhindered access in the external spaces. Because landscaping and 10% Biodiversity Net Gain (BNG) is already proposed, the amenity and biodiversity benefit of rain gardens and bioretention areas becomes superfluous and, because they provide no valuable attenuation volumes, they do not add value from a drainage strategy perspective. This is why small-scale SuDS features have not been used on Stonehouse Business Park and Lot 8.

Swales are not appropriate on Lot 8, as the change in levels from south to north is too steep to offer any attenuation, hence why pipes and stepped SuDS basins have been used. Stonehouse Business Park also includes a SuDS basin, and the presence of SuDS basins in the drainage strategy fulfils the need to include SuDS features that provide all four SuDS pillars (quantity, quality, amenity and biodiversity). Because of this, non-functional swales would be redundant in the drainage design.

Stonehouse Business Park has also not employed swales, because of the areas to be drained and the route/space a swale would require conflicts with the operational and access requirements. The first available space for surface-level SuDS has been used to provide the SuDS basin.

Jacksons Ridge has utilised permeable paviours, and has recommended the use of rainwater butts, thus source control methods are fully employed on this part of the development. Jacksons Ridge literally sits atop a ridge feature on a man-made plateau, which means that ongoing swales or SuDS features cannot be used as they would either be outside of the site boundary or on land that drops steeply away and is inappropriate for SuDS features.

The above shows how full consideration has been given to source control features, and how they have been fully evaluated against the local geo-environmental constraints, as well as the future space and operational requirements of the sites. As demonstrated, they are not suitable for all sites. Similarly, rainwater gardens are often not appropriate for commercial spaces due to the large roof areas, which have high-capacity downpipes with large flow rates that 'blow out' a rainwater garden in heavy rainfall event. This again shows the inappropriateness of certain SuDS features in certain applications."

2.4 As a final additional note on this, we would also request that the LLFA review the overall wider benefits of the proposed scheme at Stonehouse Farm, which puts the request for (and benefits) of small source control methods into context.

2.5 The land at Stonehouse Farm fell into receivership 2023 and was purchased by Hunter Group, who specialise in the sympathetic redevelopment of redundant farms and country estates.

2.6 The Hunter Group are developing Stonehouse Farm to a renatured landscape and landscape-led development proposals. Because the farm is no longer viable, most of the land will be formally registered as a biodiversity habitat scheme. There will be newly planted woodland, hedgerows, scrub land, wildflower meadows and wetland scrapes. A multifunctional recreation track will be incorporated into the renatured landscape, and nature walks accessible from an existing public footpath will be provided. Therefore, the scheme at Stonehouse Farm is championing biodiversity and this is one of the primary drivers of the scheme.

2.7 With this in mind, the overall benefit of either bioretention areas or rainwater gardens within the wider scheme become somewhat redundant. When this is allied to the fact that they have not been used where they are not appropriate, we believe that this stands as sufficient justification for their omission.

2.8 We trust that this information when viewed in the context of the wider scheme allows WSCC to remove their objection on this point.

Further information on the existing surface water drainage network which it is proposed various development proposals will connect to. Please provide details of the connection points / manholes, capacity, pipe diameters etc to ensure there is sufficient resilience within the network to cater for the proposed development.

Plans showing the entire network up to and including any watercourse connections (existing and proposed), with location headwall details. To clarify, we are aware of the existence of the watercourse as the Applicant states, however the location of the connection and the viability of the entire proposed network including this are critical to our approval. We need to be satisfied that all three independent sites have an effective and accessible network now and in perpetuity. If the proposed drainage plan cannot be implemented, this may also affect layout. For these reasons this cannot be conditioned. As per our previous response we need to see a sitewide drainage plan including connection points to any existing ordinary watercourse, topographic levels and the invert levels of any drainage features. Confirmation of easements for connections outside of the red line boundary will be required.

2.9 Points three and four, above, have been considered together in WSCC's communication, thus will also be addressed together in this response.

2.10 TN02 provided CCTV surveys of the existing drainage, as well as photos of the running outfalls.

2.11 TN02 also stated the following with regards to headwalls:

"*Plans showing the entire network up to and including any watercourse connections (existing and proposed), with location headwall details.*

Because of the information that has been provided above, and because existing outfalls will be used on the Stonehouse Business Park and Lot 8 sites that don't have headwalls this requirement has already been covered.

With regards to the proposed drainage connection from Jacksons Ridge to the watercourse, a headwall will not be used. Because the outflow from the drainage system is very low flow, it is proposed to build an informal headwall structure using concrete sandbags. This will be sensitive to the rural location (as opposed to a pre-cast concrete headwall structure) and will be simple to construct. It is proposed to build the headwall in accordance with WSCC's approved standard details for 'Headwall Detail for pipe sizes up to 600mm diam. (Concrete Bagwork)' which is in WSCC drawing S278/38/23 Rev A.

This will not project into the watercourse and, as per WSCC's 'Application for Ordinary Watercourse Land Drainage Consent: Guidance Notes [1b]' there are certain activities that do not require consent. One of these is simple outfalls that do not project into the watercourse and will not alter flow. This means the projected

outfall from Jacksons Ridge does not need consent and, because WSCC standard details are to be used, WSCC can remove their objection and, if necessary, condition the provision of this detail."

2.12 A plan has been produced that brings together the three separate drainage strategy plans into one drawing, as requested. This is in Appendix C and shows the location of the existing outfalls and the new proposed outfall from Jacksons Ridge, all relative to each other. Cover levels and invert levels of the outfall have also been provided, which demonstrate that they are topographically much lower than the development sites and prove that drainage by gravity is fully achievable and that there is an "*effective and accessible network now and in perpetuity*".

2.13 To assist the LLFA in their interpretation of the overall topography of Stonehouse Farm we have also produced a LiDAR topographic plan of the three sites, which shows the falls and levels across all of Stonehouse Farm. This is in Appendix D.

2.14 It should also be noted that easements are not required for any outfalls outside of the red line boundary. All of Stonehouse Farm is, and will remain within The Hunter Group's ownership and, as mentioned above, the land is to remain rural and will be registered as a biodiversity habitat scheme. This means that there will be no future conflict with development that could impact the existing or proposed outfalls or that require an easement. This is especially true because the only party who could impact it (The Hunter Group) is also that who has a vested interest in its protection. Therefore, a confirmation of an easement or ongoing agreement for the pipe's protection is not required.

3.0 Summary

3.1 This technical note has provided the further information requested by WSCC as the LLFA. This allows them to further understand and interpret the drainage strategies proposed across Stonehouse Business Park, Lot 8 and Jacksons Ridge to their satisfaction and remove their holding objection.

Appendix A

WSCC LLFA Holding Objection

Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Lead Local Flood Authority

Amanda Wilkes
Development Control
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Date 11th August 2025

Dear Amanda,

RE: **DC/25/0403 – Full Planning Application – Stonehouse Farm Handcross Road Plummers Plain West Sussex RH13 6NZ**

Thank you for your reconsultation of the above application, received on 14 July 2025.
To clarify, we are reviewing the application to ensure it meets the latest National Standards for SuDS and we must be satisfied the Applicant has sufficiently demonstrated adherence to all sections. National standards for sustainable drainage systems (SuDS) - GOV.UK (updated 30 July 2025).
We have reviewed the new documentation in response to our previous points below, with our updated comments in blue

1) Sufficient groundwater monitoring and infiltration testing results to confirm the Applicant's contention that infiltration will not be possible on site –

The Applicant has advised they will be using a fully lined system, which is acceptable to address this point however we will require updated technical drawings with notes confirming this.

.

2) Evidence that methods of source control have been comprehensively explored, for example French drains, rain gardens or boundary swales for tarmacadam hard standing areas.-

This point has not been addressed in the response, and as SuDS features can affect layout these cannot be conditioned (as per Principle 9). We would suggest the latest national standards are reviewed and if the Applicant is considering any further source control they advise accordingly.

3) Further information on the existing surface water drainage network which it is proposed various development proposals will connect to. Please provide details

of the connection points/manholes, capacity, pipe diameters etc to ensure there is sufficient resilience within the network to cater for the proposed development.-

Please see point 4 below

4) Plans showing the entire network up to and including any watercourse connections (existing and proposed), with location headwall details

To clarify, we are aware of the existence of the watercourse as the Applicant states, however the location of the connection and the viability of the entire proposed network including this are critical to our approval. We need to be satisfied that all three independent sites have an effective and accessible network now and in perpetuity. If the proposed drainage plan cannot be implemented, this may also affect layout. For these reasons this cannot be conditioned. As per our previous response we need to see a sitewide drainage plan including connection points to any existing ordinary watercourse, topographic levels and the invert levels of any drainage features. Confirmation of easements for connections outside of the red line boundary will be required.

Reason
To prevent flooding in accordance with NPPF, PPG Flood Risk and Coastal Change and Policy 38 in Horsham District Planning Framework.

Yours sincerely,

Flood Risk Management Team
FRM@westsussex.gov.uk

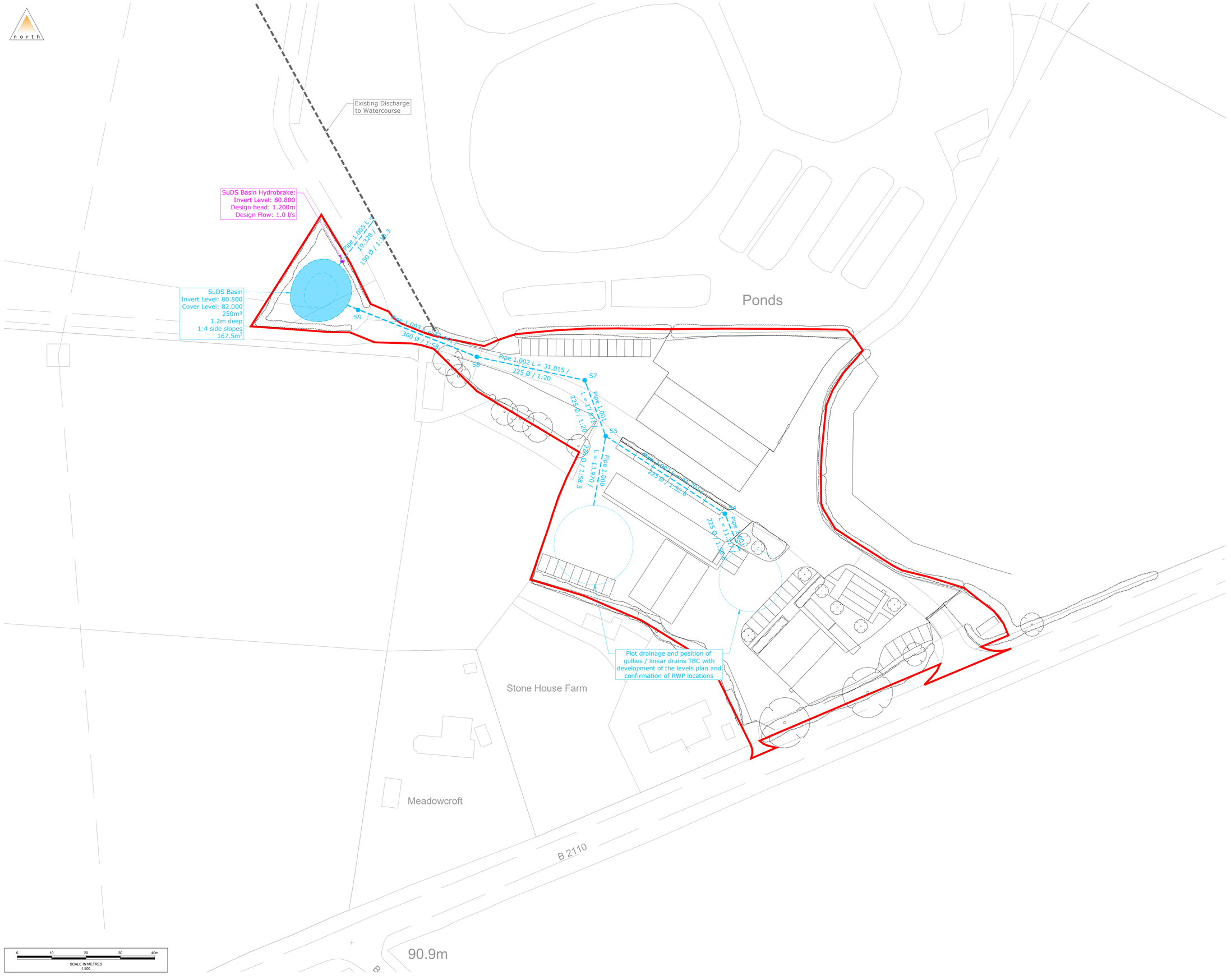
Annex

The following documents have been reviewed, which have been submitted to support the application;

Agent Emailed Response dated 24 July 2025

Appendix B

Individual Site Updated Drainage Strategy Plans



Notes

1. All levels and dimensions are to be checked on site before any work commences. All dimensions are in metres unless stated otherwise.
2. Any discrepancies shall be reported to the engineer immediately, so that clarification can be sought prior to the commencement of works.
3. This drawing shall be read in conjunction with all other relevant engineering details, drawings and specification.
4. The contractor is to keep a record of any variations made on site, including the relocation of sewers or drains, for their "as built" drawings to be prepared upon project completion.
5. All works to the adopted system are to be carried out in accordance with Sewers for Adoption, 7th Edition.
6. All works to the private drainage system to be in accordance with the Building Regulations Approved Document Part "H" 2015 edition.
7. 350mm min cover to be provided for private pipes laid in soft/paved areas. 900mm min cover to be provided for private pipes laid beneath roads/driveways unless not practicable. Where unachievable, shallow private drains may require protection using concrete surround or paving slabs bridging the trench, subject to the NHBC inspector's requirements.
8. All pipes shall be laid soffit to soffit with outgoing pipes unless otherwise stated.
9. Manholes situated within areas accessible to motor vehicles are to be fitted with suitable strength covers and frames. Please refer to the manhole schedule for guidance on this.
10. All drainage and SuDS features to be fully lined to prevent groundwater ingress.

Legend

- New SuDS Basin
- New Surface Water Gravity Pipe
- Existing Surface Water Gravity Pipe
- New SW Inspection Chamber
- New Flow Control Structure

Rev.	Description	Drn	Chk	App	Date
P03	Third Issue	PA	PA	PA	18/08/2025
P02	Second Issue	PA	PA	PA	28/02/2025
P01	First Issue	RW	PA	PA	26/02/2025

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

motion
Guildford - Reading - London
www.motion.co.uk

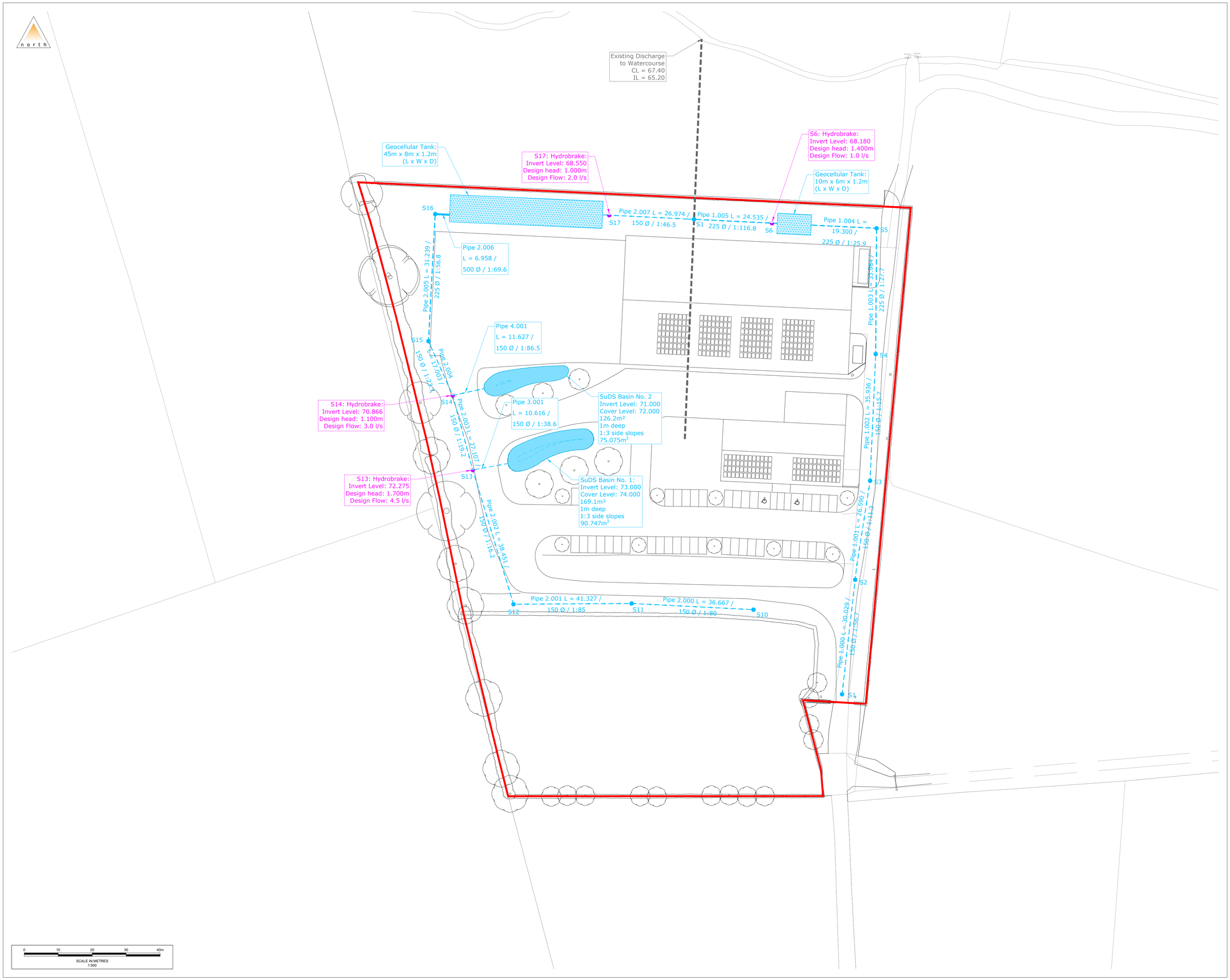
Client:
Lakeside Investments Limited

Project:
Stonehouse Farm

Title:
Stonehouse Commercial Site
Drainage Strategy

Scale: 1:500 (@ A1)

Drawing: 2501022-0502
Revision: P03



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Legend

- Gecellular Attenuation Tank
- New SuDS Basin
- New Surface Water Gravity Pipe
- Existing Surface Water Gravity Pipe
- New SW Inspection Chamber
- New Flow Control Structure

Rev.	Description	Drn	Chk	App	Date
P03	Third Issue	PA	PA	PA	18/08/2025
P02	Second Issue	PA	PA	PA	28/02/2025
P01	First Issue	RW	PA	PA	26/02/2025

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

motion
Guildford - Reading - London
www.motion.co.uk

Client:
Lakeside Investments Limitied

Project:
Stonehouse Farm

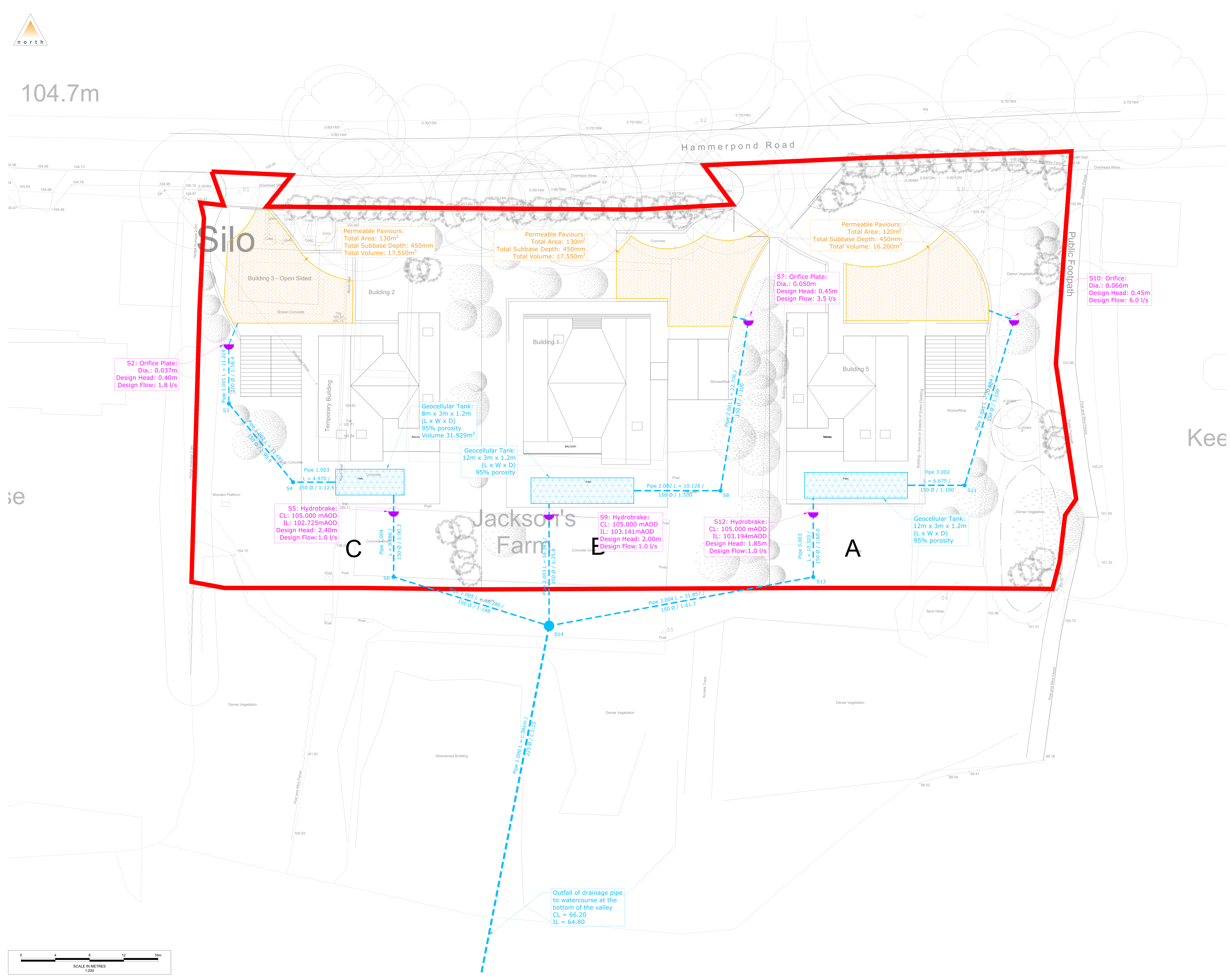
Title:
Lot 8
Drainage Strategy

Scale: 1:500 (@ A1)

Drawing: 2501022-0501

Revision: P03

C:\Users\phillen\Motion\Staff\Site - 1ecsd3 2501022\Drawings\2501022-0501-P03 [Drainage Strategy - Lot 8].dwg



north
104.7m
Hammerpond Road
Silo
Building 3 - Open Sided
Building 2
Building 1
Building 5
Temporary Building
Public Footpath
Jackson's Farm
C
E
A
Permeable Paviours:
Total Area: 130m²
Total Subbase Depth: 450mm
Total Volume: 17.550m³
Permeable Paviours:
Total Area: 130m²
Total Subbase Depth: 450mm
Total Volume: 17.550m³
Permeable Paviours:
Total Area: 120m²
Total Subbase Depth: 450mm
Total Volume: 16.200m³
S2: Orifice Plate:
Dia.: 0.037m
Design Head: 0.40m
Design Flow: 1.8 l/s
S7: Orifice Plate:
Dia.: 0.050m
Design Head: 0.45m
Design Flow: 3.5 l/s
S10: Orifice:
Dia.: 0.066m
Design Head: 0.45m
Design Flow: 6.0 l/s
Geocellular Tank:
8m x 3m x 1.2m
(L x W x D)
95% porosity
Volume 31.929m³
Geocellular Tank:
12m x 3m x 1.2m
(L x W x D)
95% porosity
Geocellular Tank:
12m x 3m x 1.2m
(L x W x D)
95% porosity
S5: Hydrobrake:
CL: 105.000 mAOD
IL: 102.725mAOD
Design Head: 2.40m
Design Flow:1.0 l/s
S9: Hydrobrake:
CL: 105.000 mAOD
IL: 103.141mAOD
Design Head: 2.00m
Design Flow:1.0 l/s
S12: Hydrobrake:
CL: 105.000 mAOD
IL: 103.194mAOD
Design Head: 1.85m
Design Flow:1.0 l/s
Pipe 2.002 L = 10.128 / 150 Ø / 1:100
Pipe 3.002 L = 6.675 / 150 Ø / 1:100
Pipe 3.004 L = 31.857 / 150 Ø / 1:61.7
Pipe 1.006 L = c381m / 225 Ø / C1:10
S14
Outfall of drainage pipe
to watercourse at the
bottom of the valley
CL = 66.20
IL = 64.80
SCALE IN METRES
1:200
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Notes

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8. All pipes shall be laid soffit to soffit with outgoing pipes unless otherwise stated.
9. Manholes situated within areas accessible to motor vehicles are to be fitted with suitable strength covers and frames. Please refer to the manhole schedule for guidance on this.
10. All drainage and SuDS features to be fully lined to prevent groundwater ingress.

Legend

- Permeable Paviours
- Gecellular Attenuation Tank
- New Surface Water Gravity Pipe
- New SW Inspection Chamber
- New Flow Control Structure
- New Manhole

Rev.	Description	Drn	Chk	App	Date
P02	Second Issue	PA	PA	PA	18/08/2025
P01	First Issue	RW	PA	PA	26/02/2025

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

Guildford - Reading - London
www.motion.co.uk

Client:
Lakeside Investments Limited

Project:
Stonehouse Farm - Jacksons Ridge

Title:
Jackson's Farm
Drainage Strategy

Scale: 1:200 (@ A1)

Drawing: 2410067-0501

Revision: P02

Appendix C

Overall Site Drainage Strategy Plan

north

Notes

1. All levels and dimensions are to be checked on site before any work commences. All dimensions are in metres unless stated otherwise.
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Legend

- New SuDS Basin
- New Surface Water Gravity Pipe
- Existing Surface Water Gravity Pipe
- New SW Inspection Chamber
- New Flow Control Structure
- Geocellular Attenuation Tank
- Permeable Paviours

0 40 80 120 160m

SCALE IN METRES
1:2000

C:\Users\philallen\Motion\Staff\Site - 1ecst3 2501022\Drawings\2501022-0502-P01 (Drainage Strategy - ALL THREE SITES).dwg

Rev.	Description	Drn	Chk	App	Date
P02	Second Issue	PA	PA	PA	20/08/2025
P01	First Issue	RW	PA	PA	18/08/2025

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

motion

Guildford - Reading - London
www.motion.co.uk

Client:
Lakeside Investments Limited

Project:
Stonehouse Farm

Title:
All Three Sites
Drainage Strategy

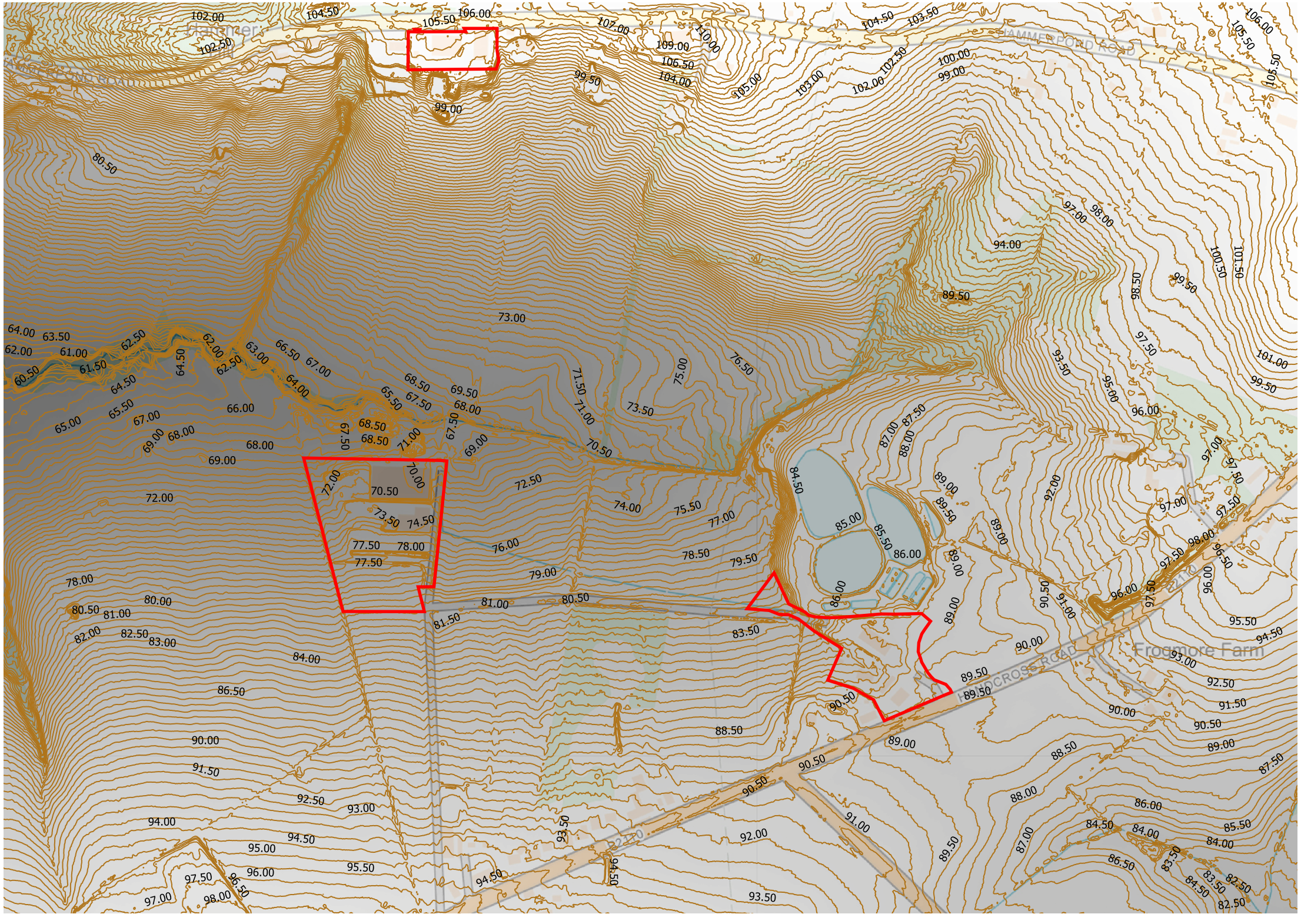
Scale: 1:2,000 (@ A1)

Drawing: 2501022-0510

Revision: P02

Appendix D

Overall Site LiDAR Topographical Plan


Hammer
HAMMERPOND ROAD
Frogmore Farm
HIND CROSS ROAD