

TO:	Horsham District Council – Planning Dept
LOCATION:	Newbrook Business Park, Pound Lane, Upper Beeding, West Sussex
DESCRIPTION:	Construction of replacement dwellinghouse
REFERENCE:	DC/25/0831
RECOMMENDATION:	Objection
SUMMARY OF COMMENTS & RECOMMENDATION:	
<p>The following documents have been reviewed:</p> <ul style="list-style-type: none"> • Block and Location Plan, Drawing No: 250822-05, Rev: B, Dated: 22-07-2025, Les Humphrey Associates • Floor Plans Roof Plans and Elevations, Drawing No: 250822 – 03, Rev: A, Dated: 27-02-2023, Les Humphrey Associates • Shed Details, Drawing No: 2520822-05, Dated: 20-07-2025, Les Humphrey Associates • DESIGN AND ACCESS STATEMENT & PLANNING STATEMENT, Dated: (Null), Application by: Mr Simon Stringer • Preliminary Ecological Appraisal, Survey Date: 5th February 2025, Arbtech • Letter from Southern Water to Horsham District Council, Dated 10th September 2025 • Flood Risk Assessment, ref: 416 FRA-v2, Dated: January 2025, RIDA • Environment Agency Consultation response, Dated 16th September 2025. <p>We have reviewed the evidence provided by the applicant in support of this planning application DC/25/0831.</p> <p>We note that the current application has recently received an Objection from the Environment Agency.</p> <p>To overcome the Environment Agency’s objection, it is noted that:</p> <p><i>"The applicant should submit evidence to demonstrate that the proposal will not pose a risk to life and/or property as highlighted above. If this cannot be achieved, (the environment agency) are likely to maintain (their) objection".</i></p> <p>Should the Environment Agency’s objection be overturned, we would require more information to support the proposals to determine that the site drainage meets the requirements of the NPPF and PPG, National standards for sustainable drainage systems (June 2025), and the Horsham District Planning Framework (2015) – Policy 38.</p> <p>Until the Environment Agency’s objection has been overturned <u>and</u> the following information in the Main Comments section is received, we are unable to determine the suitability of the proposed scheme regarding surface water and foul water drainage and flood risk.</p>	
MAIN COMMENTS:	
<p>The following information would still be required within a Drainage Strategy:</p> <ul style="list-style-type: none"> • The site is located within Flood Zone 3 (demonstrated in the GOV.UK Flood map for planning, updated March 2025). The proposed drainage strategy should be generated with consideration of flood inundation and ensure that there is no adverse impact on the site or surrounding area through the implementation of the drainage system. 	

- An assessment of the current and proposed drainage patterns entering, within, and leaving site including an understanding of how surface water would flow across the site in normal and rainfall event conditions, must be provided.
- The applicant should provide a measurement of the total site area, pre and post development permeable and impermeable areas with supporting catchment plans and calculations. All impermeable areas will need to be considered within the drainage calculations. A fully designed surface water management strategy should include:
 - The aim to achieve and better greenfield runoff rates and adherence to the drainage hierarchy.
 - Rationale for SuDS selected in line with the Horsham District Planning Framework (2015) – Policy 38, and industry best practice such as The SuDS Manual (C753).
- The method of surface water disposal must be confirmed in line with the drainage hierarchy (Building Regulations Part H*).
- The following flow and volume rates must be provided:
 - existing runoff rates during a 100% Annual Exceedance Probability (AEP), 3.33% AEP, 1% AEP storm events
 - post development discharge rates during a 100% AEP, 3.33% AEP, 1% AEP and 1% AEP + 45% for Climate Change storm events
 - greenfield runoff rate (QBAR)
 - water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + climate change storm event (see details below).
- The runoff from the proposed development should, where possible, be restricted to the greenfield 1 in 1 year runoff rate during all events up to and including the 1 in 100-year rainfall event, including adjustments for climate change. Where this is not possible, the runoff from the proposed development should restrict flows to as close as reasonably practical to the greenfield runoff rate for the site.
- The surface water drainage strategy must demonstrate that the proposed SuDS attenuate all runoff from impermeable areas (with an additional area equivalent to +10% of the area of any residential development, factored into the sum of the total impermeable areas on site, allowing for urban creep) for the 1 in 100 year rainfall event, plus an additional 45% allowance for climate change (upper end). Attenuation should be provided on site to ensure that:
 - The 100% AEP storm event does not generate excessive surcharging in the drainage system.
 - The 3.33% AEP storm event is safely contained underground with no flooding.
 - The 1% AEP storm event with climate change is safely contained within the site without risk to persons or property.
- Where infiltration discharge methods are proposed, the applicant must provide infiltration testing in accordance with BRE365, at the location and depth of proposed devices.
- Where infiltration testing has not been undertaken, provide an infiltration assessment, supported by a desk-based assessment of soil types, geology and suitability for infiltration potential (See the Horsham District Council Local Plan evidence base*), together with an alternative option for surface water disposal.
- The applicant must provide evidence of measures to prevent pollution of the receiving groundwater and or/surface water.
- The applicant must provide plans which indicate the expected exceedance routes for storm events greater than the 1% AEP + 45% (climate change) storm event. The

Drainage Strategy must demonstrate that the surface water runoff from these events can be controlled, to confirm there is no adverse flood risk to the development or elsewhere. Evidence of appropriate management and mitigation of exceedance flows are expected within the Drainage Strategy, to demonstrate that the proposed conveyance systems have considered the risks associated to nature, people and property during the event of failure and/or exceedance.

- Supporting foul flow calculations, in line with Sewerage Sector Guidance and/or Building Regulations Part H, is to be provided. It should be noted that any proposed foul water system and foul water treatment unit should be in line with current legislation and best practice for the management of domestic waste, with any method for disposal justified and appropriate permits sought.
- Maintenance and Management Plans must be provided for both the proposed Foul and Surface Water Drainage Strategy, including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.

Further evidence in addition to that requested above may be required once the additional information is submitted.

Advisory notes:

- In addition to Planning Permission, the applicant may additionally require a permit to discharge treated foul water to a water body or to ground from the Environment Agency.
- In addition to Planning Permission, the applicant may additionally require Ordinary Watercourse Consent (OWC) from the LLFA, to consent to any works adjacent to or within an ordinary watercourse.
- On the Horsham District Council website, there are a number of useful documents available to the public, which the applicant may wish to use as guides for their application. Of note is a document called 'Strategic Flood Risk Assessment Update' Dated: September 2024, Reference: CC04.

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ANY RECOMMENDED CONDITIONS:

An appropriate Flood Management and Evacuation Plan, tailored to the use of the site, will be required alongside a site-specific flood risk assessment. The Flood Management and Evacuation Plan must demonstrate a safe route of escape and floodplain compensation requirements.

NAME:	A. Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	25/09/2025