

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Parsons Field Stables Pickhurst Lane Pulborough West Sussex RH20 1DA
DESCRIPTION:	Application for the continuous use of land for the stationing of 2 static caravans for residential purposes and associated day rooms. Associated landscape works (Retrospective).
REFERENCE:	DC/25/0317
RECOMMENDATION:	More information required
<p>SUMMARY OF COMMENTS & RECOMMENDATION:</p> <p>We have reviewed the following information:</p> <ul style="list-style-type: none"> • Location Plan (Promethean Planning, 21/02/2025, Drawing no: 2502MB_R1_000) • Block Plan (Promethean Planning, 21/02/2025, Drawing no: 2502MB_R1_001) • Planning Statement (Promethean Planning, 28/02/2025) • Water Neutrality Report and Water Management Plan (Promethean Planning, 28/02/2025) <p>The Application Form states that surface water will be discharged via infiltration. However, a Surface Water Drainage Strategy has not been provided. The provided Planning Statement, dated 28/02/2025, is not sufficient.</p> <p>We have reviewed the evidence provided by the applicant in support of the planning application. The proposals will result in an increase in impermeable area and therefore more information is required due to the absence of an acceptable drainage strategy and additional information relating to:</p> <ul style="list-style-type: none"> • Whether the site drainage meets the requirements of the NPPF, PPG SuDS Non-Statutory Technical Standards (NSTS) (March 2015), the West Sussex LLFA Policy for the Management of Surface Water (2018), and the Horsham District Planning Framework (2015) – Policy 38 <p>MAIN COMMENTS:</p> <p>The applicant must provide the following information:</p> <ul style="list-style-type: none"> • Site drainage patterns – assessment of the current drainage patterns and clarification of the proposed drainage patterns entering, within, and leaving site including an understanding of how surface water would flow across the site in normal and exceedance event conditions (see to GOV.UK Long term flood risk mapping). This would include drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change for the existing and proposed site and surround. • Measurement of the pre and post development permeable and impermeable areas with supporting catchment plans and calculations. • In case the proposed surface water discharge via infiltration is proven to be unviable, then an alternative surface water drainage method should be provided. 	

In that case, provide the following flow and volume rates with supporting evidence, for both greenfield and previously developed sites (see the UKSUDS.com tool):

- 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 + Climate Change storm events;
 - greenfield runoff rate (Q_{BAR});
 - water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.
- Where infiltration discharge methods are proposed, provide infiltration testing in accordance with BRE365, at the location and depth of proposed devices. Minimum proven infiltration rates are 1×10^{-6} m/s, as per The SuDS Manual (C753). Any infiltration structure should have half drain down times less than 24 hours and be constructed a minimum of 1.0m above the highest groundwater level.

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.

- Fully designed surface water management strategy including:
 - the aim to achieve and better greenfield runoff rates and adherence to the drainage hierarchy.
 - rationale for SuDS selected in line with the West Sussex LLFA Policy for the Management of Surface Water (2018), Horsham District Planning Framework (2015) – Policy 38 and Industry best practice, such as The SuDS Manual (C753).
- Evidence of measures to prevent pollution of the receiving groundwater and or/surface water. Proposals must demonstrate the development's risk and mitigation provided for water quality risks to surface water and groundwater bodies. This is required to comply with SuDS Policy 7: Safeguard Water Quality as per Section 6.1 of the LLFA Policy. Generally, an appropriate assessment to provide is the Simple Index Approach (SIA) of Section 26 in SuDS Manual (CIRIA C753).
- Detailed surface water drainage strategy, including supporting calculations, detailing outfall location, runoff rate/s as per the LLFA's SuDS Policy 3, required and proposed volumes of attenuation storage, freeboard and sizing of all drainage features, should be provided. A detailed drainage layout plan should reference all assets showing characteristics such as; pipe sizes and materials, gradients, and manhole type, depth, size, SuDS dimensions, materials and depths.
- If applicable, provide evidence of a third-party agreement to discharge surface water
- Maintenance and Management Plan including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.
- The Planning Statement notes that foul water is proposed to be disposed by a highly efficient package treatment plant. It is also mentioned that in the absence of mains drainage; this is considered to be an appropriate means of foul water disposal, which would avoid harm to the quality of soils.

According to the Planning Statement, the package treatment plant will be installed and fully operational prior to occupation of the development. The package treatment plant will be installed in accordance with the manufacturers' recommendation and instructions and in accordance with the Building Regulations. The package treatment plant will be serviced by a qualified British Water accredited engineer on an annual basis in accordance with the manufacturers servicing and maintenance guide to ensure it is operating efficiently and effectively.

The annual service should include an assessment of the activated sludge volume in the reactor in accordance with the manufacturers servicing and maintenance guide.

According to the Planning Statement, the runoff from the treatment plant will be taken to a soakaway drainage field.

However:

- The foul drainage proposed outfall destination must be prioritised as per the hierarchy of foul drainage (requirement H1 of the Building Regulations 2010). In the first instance this is into the existing public foul sewer network if available. The applicant has not demonstrated whether an existing foul sewer network is located within the vicinity of the proposed development.
- A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H must be provided, including:
 - A detailed drainage layout, showing pipe sizes, materials, gradients and outfall location.
 - Confirmation of permission to connect to a private/public sewer, if applicable, must also be provided.
 - Confirmation of an environmental permit for foul discharges, if relevant, should also be provided.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	C Bakopoulou E Edney R Fisher
DEPARTMENT:	Horsham District Council - Drainage
DATE:	17/03/2025