TO:	Horsham District Council – Planning Dept
LOCATION:	Ghyll House Farm, Limekiln Farm Broadwater Lane Copsale West Sussex RH13 6QW
DESCRIPTION:	Erection of a temporary workers dwelling for security, stud and equine rehabilitation. To include change of use to the land to the south of Limekiln Wood from agricultural to mixed use agricultural and equestrian, including the barn for the broodmares and retirement horses and alpacas.
REFERENCE:	DC/25/0883
RECOMMENDATION:	More Information

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the below information in support of the planning application:

- Flood Risk Assessment – Response to HDC Drainage Department "Summary of Comments & Recommendations" Dated 08/03/2024 (Newell Stud, Undated)
- Flood Risk Assessment – Calculations: Causeway Storm Network (CGS Civils Ltd, 06 December 2024)
- Flood Risk Assessment – Storm Network Plans: Causeway Storm Network (CGS Civils Ltd, 06 December 2024)
- Location Plan (Reference 082/01f, June 2025)
- Site Plan (Reference 082/02b, May 2025)
- Layout plan, Roof plan & Elevations (Reference 082/03, 07 May 2025)
- Water/Drainage Plan (Reference 082/04, May 2025)
- WSCC LLFA Consultation Response (31 July 2025)

We require more information to support the proposals to determine that the site drainage meets the requirements of the NPPF and PPG, SuDS Non-Statutory Technical Standards (NSTS) (June, 2025), and the Horsham District Planning Framework (2015) – Policy 38.

The Causeway modelling appears to show a drainage strategy for a different application and site. Therefore, it contradicts information enclosed in the Flood Risk Assessment. The applicant must clarify the method of attenuation and disposal of surface water for this application.

The information detailed in the Main Comments section below is required.

MAIN COMMENTS:

We have reviewed the evidence provided by the applicant in support of the planning application.

- The document 'Flood Risk Assessment – Response to HDC Drainage Department "Summary of Comments & Recommendations" Dated 08/03/2024' responds to comments made on application reference DC/23/1325, not application reference DC/25/0883. The details provided appear to cover a wider scheme, as per application reference DC/23/1325. The site area shown in this document is part of the site shown on the drawing 'Location Plan'. The Flood Risk Assessment says that the site is 0.87ha. However, the greenfield runoff rates calculations show the site area is 0.91ha. Conversely, the redline boundary is shown as 11.58ha.

- Some of the information received seems to be contradictory. The Flood Risk Assessment document outlines the SuDS strategy is for rainwater harvesting with surface water to discharge to the watercourse or infiltrated to ground. The drawing 'Water/Drainage Plan' indicates surface water and foul drainage for the temporary workers dwelling only and does not include the barn. The Water/Drainage Plan shows roof rainwater is collected then flows through a perforated drainage pipe prior to discharge to the eastern watercourse.

  Conversely, the Causeway network model does not appear to correspond with either the document or the drawing. The model involves two areas of permeable paving which infiltrate to ground, and an attenuation storage feature prior to discharge to the eastern watercourse at 2 l/s. The Causeway model details provided appear to cover a different scheme, uploaded for application reference DISC/24/0255. The applicant must clarify the method of attenuation and disposal of surface water drainage for this scheme. The documents and drawings must all correspond with the final strategy.

- The Causeway model shows flow is restricted to 2l/s however this appears to cover a different scheme as mentioned above. 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. Control orifices 50mm or less must be protected to reduce the risk of blockages. Thorough assessment of the risk of blockage of flow controls and mitigation should be provided and demonstrated.

- The applicant has indicated that surface water from the proposed roof will discharge to a rainwater harvesting (RWH) system. While the use of RWH is welcomed, the operational volume within the unit cannot be used for surface water attenuation, as there is no guarantee of the water use within the property or the availability of the storage. Therefore, evidence is required to show the overall surface water system has sufficient capacity to provide the necessary stormwater attenuation without reliance on the RWH system. For RWH design, refer to BS EN 16941-1 2018 On-site non-potable water systems, and Chapter 11 of The SuDS Manual to demonstrate additional stormwater attenuation compliance.

- The Flood Risk Assessment document states that the site is on a sandy clay with sandstone to 5m depth. The document indicates that the infiltration potential of the soil will be confirmed by an infiltration test, to determine if soakaways can be utilised. If infiltration is proposed then infiltration testing, undertaken in the winter period at the location and depth of the proposed structures, in accordance with BRE Digest 365, CIRIA R156 or another approved method, should be provided via on site testing to support the design.

  Tests should be undertaken during winter / early spring when ground water levels are typically highest. Minimum proven infiltration rates are 1x10-6 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. In Source Protection Zone 1 areas (see the Magic Map Application), Environment Agency consent is required, and additional protection to ground water may be required.

- If infiltration testing cannot be undertaken at this stage, an assessment of infiltration should be provided, which can be a desk-based assessment of existing drainage arrangements, soil types, geology and suitability for infiltration potential. Sufficient

evidence should be provided to provide confidence that the method of surface water disposal is credible and achievable for the development.

- The Water/Drainage plan has a note as follows: 'Brickwork headwall see cgs civils detail drawing'. Please provide this drawing for review as it does not appear to have been uploaded.

- The applicant should provide a foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H, including a detailed drainage layout, showing pipe sizes, gradients and levels.

- The foul water treatment unit must discharge to a new chamber, which includes a sampling point and shut-off valve, prior to discharging to the surface water system and existing watercourse.

- The applicant must provide evidence of measures to prevent pollution of the receiving groundwater and/or surface water assets. Pollution control and water quality measures should be provided in accordance with the Simple Index Approach as outlined in CIRIA C753 The SuDS Manual.

- The applicant must provide a Maintenance and Management Plan including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.

- The applicant must provide drawings showing conveyance routes for the 1 in 100 year plus climate change event and consideration of how exceedance flows for events greater than this will be managed and mitigated on site without significantly increasing flood risk (both on site and outside the development).

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

Advisory note:

- The document 'Flood Risk Assessment – Response to HDC Drainage Department "Summary of Comments & Recommendations" Dated 08/03/2024' states that no permission is required as the watercourse is not a Main River. However, 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. As this proposal seeks to discharge water into the watercourse, OWC will likely be required.

- 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.

ANY RECOMMENDED CONDITIONS:

Further information is required before conditions are recommended.

NAME:	Y Riley E Edney A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	08/08/2025