

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land West of Parsons Field Stables, Pickhurst Lane Pulborough West Sussex
<b>DESCRIPTION:</b>	Use of land for the stationing of 2 static caravans for residential purposes and associated day rooms. Erection of stable building and formation of hardstanding (retrospective). Associated landscape works including planting of native hedges and removal of hardstanding and American barn
<b>REFERENCE:</b>	DC/25/1371
<b>RECOMMENDATION:</b>	<b>Objection – *More Information</b>

#### **SUMMARY OF COMMENTS & RECOMMENDATION:**

The following documents have been reviewed in relation to this application:

- Drainage Strategy, Reference: 7657\_RH20\_Pickhurst Lane\_07, Revision: 5, Date: 21/10/2025, Aegaea.

**HDC Drainage note that the existing development on site is unlawful.** The development on site does not have planning permission and as such, the existing site conditions must be assessed as Greenfield. All development on site must be considered within the proposals and be encompassed within a foul and surface water drainage strategy.

HDC drainage have reviewed the evidence provided by the applicant in support of this planning application. HDC Drainage **Object** to the proposals, as the site drainage does not meet the requirements of the NPPF and PPG, National standards for sustainable drainage systems (June 2025), and the Horsham District Planning Framework (2015) – Policy 38.

**\*To overrule an objection to the drainage proposals, the information in the Main Comments section below must be provided. Until then, HDC Drainage are unable to determine the suitability of the proposed scheme regarding surface water and foul water drainage. At present, the information provided does not support the development on site or any further proposals.**

#### **MAIN COMMENTS:**

- The site must be assessed as Greenfield and an assessment of how the site drained, prior to any development, must be provided.
- Verification of how hardstanding will be removed from site must be provided. This is to demonstrate that all foreign/alien materials from recent unlawful development will be removed, reinstating the area of the fields/ pasture, as close as reasonably possible, back to its former greenfield state.
- HDC note that the Proposed Drainage Layout, as presented on page 21 within the Drainage Strategy report, depicts "*All proposed hardstanding to be porous surface*". HDC drainage note that the hardstanding has already been laid on site (as observed on Google Earth Pro). No assessment of the materials used has been provided. Evidence of what materials have been laid on site must be provided to demonstrate that the materials used are porous and infiltration is possible. Should this not be the case, the drainage strategy must be amended to include all areas of hardstanding

within the catchment for the surface water drainage strategy and the resulting overland flow must be managed appropriately.

- To note, the current drainage catchment area considered is 0.0395ha whereas the total site area is 0.592ha. Should the hardstanding on site not be demonstrated to be porous/ permeable, HDC Drainage expect to see the resulting catchment area included within the calculations for the surface water drainage strategy.
- The applicant should provide a measurement of the total site area, all pre-development permeable and impermeable areas within the red line boundary, all post-development permeable and impermeable areas within the red line boundary, with supporting catchment plans and all corresponding 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 foul and surface water disposal must be confirmed in line with the drainage hierarchy (Building Regulations Part H).
- Where rainwater harvesting (RWH) is proposed, the appropriate sized storage unit for this system must be provided on site.
- Whilst the use of RWH is welcomed and encouraged, the operational volume within the storage unit cannot be considered a component of the total stormwater attenuation on site because there is no guarantee of water use within the property or the availability of the storage unit (system failure). Therefore, evidence is required to show the overall surface water drainage system has sufficient capacity to provide the necessary stormwater attenuation, without reliance on the RWH system.
- 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 (100% AEP) during all events up to and including the 1 in 100-year rainfall event (1% AEP) + 45% allowance 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 all 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 (1% AEP) + 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 + climate change storm event is safely contained within the site without risk to persons or property.
- Where infiltration discharge methods are proposed (soakaways/swales etc...), the applicant must provide infiltration testing in accordance with BRE365, at the location and depth of the 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 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 plans which indicate the expected exceedance routes for storm events greater than the 1% AEP + 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, where non-mains foul drainage is proposed.
- In addition to Planning Permission, the applicant may additionally require Ordinary Watercourse Consent (OWC) from the Lead Local Flood Authority at West Sussex County Council, to consent to any works adjacent to or within an ordinary watercourse.
- On the Horsham District Council website, there are several useful documents available to the public, which the applicant may wish to use as guides for their application. To navigate to this page you can follow this link:  
<https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Examination-Library>

Alternatively, here is how to navigate to that page on the HDC Website:

Home > Planning and development > Local Plan > Local Plan examination > Examination Library > Evidence Base Documents > Climate Change and Water

<b>ANY RECOMMENDED CONDITIONS:</b>	
NA	
<b>NAME:</b>	A. Furness
<b>DEPARTMENT:</b>	Horsham District Council - Drainage
<b>DATE:</b>	12/11/2025