TO:	Horsham District Council – Planning Dept
LOCATION:	Oakhurst Centre West Chiltington Lane Coneyhurst West Sussex
DESCRIPTION:	Outline application for the demolition of existing buildings and erection of 9No self-build / custom build dwellings with all matters reserved.
REFERENCE:	DC/25/0486
RECOMMENDATION:	More Information

SUMMARY OF COMMENTS & RECOMMENDATION:

The following documents have been reviewed:

- Letter from Environment Agency to Horsham District Council, dated: 19th January 2026
- Flood Risk Assessment, Dated: November 2025, EAS Ltd.

No drainage strategy has been submitted and therefore HDC Drainage are unable 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 35 and Policy 38.

HDC request **more information at this outline stage** and strongly advise that the applicant consider Drainage a design constraint, taking into consideration the concerns highlighted by the environment agency in relation to groundwater vulnerability.

NOTE: The existing site is Brownfield Land. There is an opportunity here to improve site drainage and mitigate surface water flood risk, *if* surface water drainage is considered early and as part of the overall design of the development.

MAIN COMMENTS:

At this outline stage, HDC Drainage require:

- A Topographic Survey of the site (as existing).
- An assessment of levels within the surrounding landscape, as overland flows may influence drainage patterns on site.
- An assessment of current drainage patterns on site.
- Existing Greenfield runoff rates and volumes.
- An understanding of winter groundwater levels and infiltration potential on site.
- Proposed methods of foul and surface water disposal, which must be confirmed in line with the drainage hierarchy (Building Regulations Part H).
- A plan showing the outline drainage strategy, identifying proposed attenuation areas and discharge points.

Here is the level of detail which HDC Drainage expect to see within a full planning application:

- The applicant must demonstrate an understanding of how surface water currently flows across the site under 'normal' conditions and during rainfall events, providing an assessment of the current and proposed drainage patterns entering the site, within the site and leaving the site.

- 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 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).
- If connections to Southern Water Utilities are proposed as part of the development/ redevelopment, supporting plans and assumed points of connection must be provided as well as expected flow rates. Connection to the public sewerage network is advised, wherever it is reasonable to do so.
- 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 <u>all</u> 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 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.
- 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
- Whilst not a mandatory requirement, HDC Drainage welcome and encourage the consideration of rainwater harvesting within the proposed development.

ANY RECOMMENDED CONDITIONS:

NA - More Information will be required prior to Drainage being considered within a DISC application.

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	16/02/2026