

TO:	Horsham District Council – Planning Dept
LOCATION:	Ghyll House Farm, Limekiln Farm Broadwater Lane Copsale, West Sussex
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 change of use of the existing barn.
REFERENCE:	DC/25/0883
RECOMMENDATION:	Objection
<p>SUMMARY OF COMMENTS & RECOMMENDATION:</p> <p><u>History:</u></p> <ul style="list-style-type: none"> A drainage consultation response to application DC/25/0883 was issued on the 08/08/2025 advising 'More Information'. [Submitted Drainage Strategy: Water/Drainage Plan, Reference 082/04, May 2025.] <p>In reference to this application, the following documents have since been reviewed:</p> <ul style="list-style-type: none"> Revised Site Plan: Limekiln Farm Temporary Equine Workers' Dwelling. Drawing No: 082/02d. Dated: August 2025. Design & Access Statement. Dated: END/18-09-2025. Water/Drainage Plan: Limekiln Farm Technology Equine Workers' Dwelling. Drawing No: 082/04b. Dated: August 2025 * See below * Oakleigh Farm Plan. Drawing No: 082/05. Dated: September 2025. <p>* The 'Water/Drainage Plan' references DC/23/1325. It should be noted that Horsham Drainage Objected to DC/23/1325 on the 13/06/2024: "Objection, recommending more information" notably, due to an absence of an acceptable drainage strategy.</p> <p>The following documents have been reviewed in reference to DC/23/1325, to reference this planning application against:</p> <ul style="list-style-type: none"> Flood Risk Plan: Limekiln Frm Equine Centre. Drawing No: MBP/ 0523/14A. Dated: November 2023. Location Plan: Limekiln Frm Equine Centre. (Description: Drainage Plan). Drawing No: MBP/ 0523/20. Dated: May 2024. [This plan is referenced in the decision notice for DC/23/1325 dated 12/08/2024, as 'Details Plan: SCHEMATIC DRAINAGE PLAN'] <p>It is noted, that following the drainage consultation response on the 08/08/2025, the proposed temporary dwelling has been relocated to the west and the drainage strategy has been revised, differing considerably to the Water/Drainage Plan, Reference 082/04, May 2025 (referred to in the drainage consultation response 08/08/2025).</p> <p>We have reviewed the evidence provided by the applicant in support of this planning application DC/25/0883.</p> <p>In reference to the '<u>Erection of a temporary workers dwelling for security, stud and equine rehabilitation</u>' Horsham Drainage Object to the proposed Drainage Strategy as the applicant has not provided enough supporting evidence to determine that the site drainage meets the requirements of the NPPF and PPG, National standards for</p>	

sustainable drainage systems (June 2025), and the Horsham District Planning Framework (2015) – Policy 38.

No drainage information was provided regarding the 'change of use' to 'the existing barn'. Horsham Drainage cannot therefore provide a response to this aspect of the proposals. Please re-consult Horsham Drainage for this aspect of the proposals, if appropriate.

To overrule an objection to the proposals, the information in the Main Comments section below must be provided, to determine the suitability of the proposed scheme regarding surface water and foul water drainage and flood risk.

MAIN COMMENTS:

To support the drainage strategy, the applicant must provide the following, ideally contained within a Drainage Strategy Report:

- As this application wishes to be incorporated into the drainage strategy for DC/23/1325, the drainage proposals for this application **must** reference the drainage layout for the approved planning application DC/23/1325. The proposals for this application **must** clearly demonstrate how they will be incorporated into the drainage strategy for the "approved" DC/23/1325. This is to verify there are no conflicts between each of the strategies or contradictions between the plans. Amendments to the drainage strategy for DC/23/1325 will be noted and brought to the attention of the Planning Case Officer.
- To incorporate the proposals for DC/25/0883 into the Drainage Strategy for DC/23/1325, Horsham Drainage expect to see all supporting calculations, clearly demonstrating the scheme has capacity for the additional proposals without presenting a flood risk for both foul and surface water.
- 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

ANY RECOMMENDED CONDITIONS:

NA

NAME:	AF
DEPARTMENT:	Horsham District Council - Drainage
DATE:	03/11/2025