

TO:	Horsham District Council – Planning Dept
LOCATION:	St Crispins Church Church Place Pulborough West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3, 4 and 5 to approved application DC/23/1361
REFERENCE:	DISC/26/0192
RECOMMENDATION:	Pre-Commencement Condition 4: More Information
SUMMARY OF COMMENTS & RECOMMENDATION: 4 Pre-Commencement Condition: <i>No development shall commence until a drainage strategy detailing the proposed means of foul and surface water disposal has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme.</i> In reference to this application DISC/26/0192, the following documents have been reviewed: • Appendix 1, Groundsure Data, Report Ref 21/12217/KJC, Dated: 21/09/2021, Client: Albury S.I. Ltd • Soils Limited Main Investigation Report, Reference: 22384/MIR Rev1.0, Dated: May 2026. • Drainage Area Plan, Drawing No: LDS593/109, Dated: 18/06/2026, Author: Latham Development Services. • Proposed Drainage Plan, Drawing No: LDS593/101, Dated: 18/06/2026, Author: Latham Development Services. • Infiltration Storage Estimate, Reference: LDS593 Version 1, Dated: 18/06/2026, Author: Latham Development Services. • Greenfield runoff rate estimation tool, HR Wallingford, Dated: 17/06/2026 • Pavement Construction Details, Drawing No: LDS593/103, Dated: 18/06/2026, Latham Development Services. In reference to application DC/23/1361, the following documents have also been reviewed: • Letter of correspondence from Southern Water to Horsham District Council, Dated: 11/08/2023 <i>"The 150 mm diameter gravity sewer requires a clearance of 3 metres on either side of the gravity sewer to protect it from construction works and to allow for future maintenance access."</i> <i>"No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of public or adoptable gravity sewers."</i> HDC Drainage note the Drainage Strategy plan (for DISC/26/0192 - LDS593/101) shows that adoptable Foul sewers lie beneath an area of permeable paving which is believed to conflict with this request. The applicant must amend or provide a response to this design decision. HDC Drainage expect to see further communication with Southern Water in relation to the proposals for DISC/26/0192. • Drainage Strategy, Dated: 26th July 2022, Issue: <u>Draft</u>, Dated: 26th July 2022 <i>"...although BRE365 soakage tests have not been carried out for the site, the drainage strategy intends to use infiltration with an assumed infiltration rate of 5 x 10⁻⁶ metres per second as this approach has been reviewed and approved by</i>	

the LLFA on the neighbouring site." HDC Drainage does not find it acceptable for the applicant to rely on this for this for DISC/26/0192. An assumption is not considered to be acceptable at this stage of the Planning Process. Infiltration rates **must** be confirmed through on-site testing, as the surface water drainage strategy is solely reliant on a singular point infiltration system. BRE365 is considered the industry standard and is expected in this instance.

With regards to Micro Drainage Network Model Results in this report, FSR data has been used not FEH22, and winter/summer CV values are not set at 1. These factors **must** now be considered for DISC/26/0192. HDC Drainage advise that the applicant considers revising this document with the requested modelling inputs above and further considerations requested in the Main Comments section below, before re-submitting it to support DISC/26/0192.

The surface water drainage strategy is reliant upon infiltration to the ground, but the applicant hasn't provided robust evidence to suggest infiltration on site is suitable to effectively drain away the volume of water anticipated from all impermeable areas on site, the infiltration rate has only been assumed.

Connecting surface water to a surface water sewer isn't possible for this site, as there isn't one nearby to connect to. Connection of surface water to the foul only sewer will not be permissible under any circumstance. Unless infiltration is proven to be effective on site and simulations of the surface water drainage system demonstrates that there is no flood risk for all events up to and including the 1 in 100-year storm event (with additional allowances for climate change and urban creep), HDC Drainage will have no option but to object to the proposed strategy. This must be resolved before any development proceeds.

The level of information provided is insufficient to consider discharging Pre-Commencement Condition 4. HDC Drainage request **more information** 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.

MAIN COMMENTS:

- The applicant should provide evidence of communication with Southern Water.
- The applicant should respond to concerns regarding the 150mm gravity sewers beneath an area of permeable paving (see blue text in summary).
- The Surface Water Drainage Strategy **must** also be modelled and simulated using FEH22 rainfall data, with CV Values set at 1.
- Within the 'Soils Limited Main Investigation Report' Table 3.3. 'Test Records' (following principles of BRE365) show that Infiltration Rate (m/sec) for all exploratory holes, was not calculated: **"Insufficient head loss to calculate."** An additional note reads: **"Invert level was taken at the water depths at the start of the test. Soakaway performance would be impacted by slow infiltration"**. The calculations within the 'Infiltration Storage Estimate' document, however, use Peak Discharge Rate of 0.018 m/hr as the infiltration coefficient. HDC Drainage understand this to be the velocity equivalent: 5.0×10^{-6} m/s, which is the assumed discharge rate from a neighbouring site.
- SuDS Suitability Mapping on the HDC portal indicates that Infiltration Suitability may be moderate on site. The applicant must provide testing in accordance with BRE365, at the location and depth of the proposed devices. (See blue text in summary and red text above).

- 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.
- If restricting runoff rates back to the 1 in 1-year greenfield runoff rate is considered unreasonable, HDC Drainage may allow discharge rates to be restricted to as close as feasibly possible, limiting up to a 50% betterment of the brownfield 1 in 1-year runoff rate as a last resort.
- 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.
- The applicant must provide evidence of measures to prevent pollution of the receiving groundwater and/or surface water.

The site sits on top of a secondary superficial aquifer (highly vulnerable), as shown on page 41 of the Groundsure Report. The use of further proprietary filtration systems should be considered, or reassurances should be provided about the filtration potential of the SuDS features used on site. Considering proximity to railway line, is the 'Permeable Paving Inlet' (Typical 380mm min depth) shown on the Proposed Drainage Plan also the 'Catchpit Chamber' shown on the Pavement Construction Details drawing? ...and is this sufficient to mitigate concerns regarding pollution from roofs and from the parking areas, which HDC Drainage note have not been associated with permeable paving? The applicant should provide a response.

HDC Drainage note that within the Soils Limited Main Investigation Report, exploratory holes TPSK1, TPSK2 and TPSK3 were dug to a depth of 2.5m and Groundwater was not encountered during the investigations on the 14th-15th April 2026. (TPSK1 and TPSK3 were located approximately where the soakaway is proposed, therefore, it is anticipated that a soakaway of 0.8m depth will achieve a clearance of 1m between the SuDS device and groundwater level).

- 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, should be provided.
- 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.

ANY RECOMMENDED CONDITIONS:

NA

NAME:

A.Furness

DEPARTMENT:

Horsham District Council - Drainage

DATE:

16/07/2026