TO:	Horsham District Council – Planning Dept
LOCATION:	Gess Gates Farm Stane Street Adversane West Sussex RH14 9JR
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3,4,5,6,7, 15 and 18 to approved application DC/24/0345
REFERENCE:	DISC/25/0017
RECOMMENDATION:	Condition 4: Not satisfied, more information required

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the below information provided by the applicant:

- Causeway modelling (25 June 2025, VKHP Consulting Ltd, 663025-C02)
- Drainage Construction Detail (25 June 2025, VKHP Consulting Ltd, 663025-101, Rev -)
- Drainage Layout (25 June 2025, VKHP Consulting Ltd, 663025-100, Rev -)

4. Pre-Commencement Condition: 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.

Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).

We have reviewed the additional evidence provided by the applicant in support of the planning application. 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 applicant must provide the information as detailed in the Main Comments section.

MAIN COMMENTS:

Until the following information is received, as previously requested, we are unable to determine the suitability of the proposed scheme with regard to surface water and foul drainage:

- The applicant should provide an assessment of the current and proposed drainage patterns entering, within, and leaving the site, including an understanding of how surface water would flow across the site in normal and rainfall event conditions.

- The applicant should provide a measurement of pre and post development permeable and impermeable areas with supporting catchment plans and calculations.

- The Drainage Layout shows surface water and treated foul water are to be combined to the 225mm pipe which has a new connection to the watercourse restricted to 1.5 l/s. Justification for restricting flow to 1.5l/s must be provided. For appropriate discharge rates, please read the National standards for sustainable drainage systems (June 2025), Standard 3: Runoff rates and volumes to surface waters or sewers.

"The peak allowable discharge rate from the development to surface waters or sewers for the 50% AEP event shall be limited to the equivalent 50% AEP greenfield runoff rate (which is noted in the standards as being equivalent to Qbar), or 3 l/s/ha, whichever is the greater.

When discharging to an above ground surface water body, sewer or other piped drainage system, the surface water runoff rate for the 50% AEP event shall be controlled to ensure development runoff from an event of this magnitude has no negative impact."

Summary: runoff rate = 1 in 2 year (or Qbar) or 3 l/s/ha (whichever is greater)

- 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 method of surface water disposal must be in line with the drainage hierarchy. Consideration of the drainage hierarchy, and discounting of a higher priority destination must be evidenced.

- If discharge to the watercourse is proposed and infiltration drainage methods are not proposed, provide an infiltration assessment supported by a desk-based assessment of soil types, geology, to demonstrate the lack of suitability for infiltration potential.

- The applicant should provide a surface water management strategy with the aim to achieve and better greenfield runoff rates and adherence to the drainage hierarchy (Building Regulations Part H). 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).

- Provide a detailed surface water drainage strategy, including supporting calculations (with allowance for urban creep), and proposed volumes of attenuation storage, freeboard, and sizing of all drainage features. The surface water runoff from the proposed hardstanding area must be included in the drainage strategy. A detailed drainage layout plan should reference all assets, showing characteristics such as pipe sizes, materials and gradients the manhole type, depth, and size, and the SuDS dimensions, materials, and depths.

- The site is located in the Arun and Western Streams management catchment, and the applicable peak rainfall climate change allowance for 1 in 100 year event is +45% (2070s, Upper End Allowance). The applicant has used the 1 in 100 plus 40% allowance for climate change in the calculations. The 1 in 100 year plus 45% climate change allowance must be assessed.

- Thank you for providing Causeway modelling. We have the following comments:
  - FEH 2022 data should be used, rather than FSR data.
  - CV value of 1 should be used for both Summer and Winter.
  - In the Causeway model, the outfall has flow restricted to 1.5 l/s. However, in the drainage layout the foul flow is being combined with the surface water ahead of

the flow control manhole. The incoming foul flow has not been included in the Causeway model.

- Pipe lengths exceed the maximum allowable by Building Regulations Part H and so intermediate chambers must be added on the outfall pipe run.
- No cover or invert levels have been provided on the plan to cross reference with the calculations.

- If areas of hardstanding are positively drained to the watercourse, the applicant must provide evidence of proposed measures to prevent pollution of the receiving surface water.

- The applicant should 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 should 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 should 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).

- A strategy to ensure adequate drainage of surface water must be included in the surface water drainage proposals to provide mitigation and betterment to the existing scenario.

- The foul drainage outfall must be in line with the foul drainage hierarchy (requirement H1 of the Building Regulations 2010). In the first instance this is into the existing public foul sewer network if available. A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H is to be provided, including a detailed drainage layout, showing pipe sizes, materials, gradients, and outfall location.

- The foul water treatment system must be fully specified and have an outfall to a chamber with a shut off valve and sampling point. The treatment unit must be sited more than 7m away from a habitable dwelling.

- There must be a chamber where the foul and treated water combine, with the foul water entering at a higher level to prevent surcharge backup from a storm event disrupting the treatment works.

The applicant is yet to provide the information and until such time as this information is received, Horsham District Council Drainage cannot determine the suitability of the proposed scheme with regards to surface water and foul drainage.

Advisory note:

- Approval is required from Southern Water for connection to the public sewer under Section 106 of the Water Industry Act 1991.
- 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.

Conditions 3,5,6,7, 15 and 18 Conditions 3,5,6,7, 15 and 18 to approved application DC/24/0345 were not reviewed as not in the scope of drainage.	
ANY RECOMMENDED CONDITIONS: More information is required before conditions are recommended.	
NAME:	Y Riley L Derrick A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	10/07/2025