TO:	Horsham District Council – Planning Dept
LOCATION:	Former Arun Feedmills Sincox Lane Shipley West Sussex
DESCRIPTION:	Approval of details reserved by condition 3 to approved application DC/23/2278
REFERENCE:	**DISC/26/0355**
RECOMMENDATION:	Objection - More Information

SUMMARY OF COMMENTS & RECOMMENDATION:

The following documents have been reviewed:

- Design and Access Statement for DC/23/2278
- Letter of correspondence from Highway Transportation & Infrastructure Consultants to Drainage Dept. Horsham District Council, Dated: 1st October 2026.
- Drainage Calculations, Created in InfoDrainage 2026.4
- Drainage Construction Details, Dwg 6129-1008, Rev A, Dated: 30/10/2026, Author: Bellamy Roberts
- Proposed Access and Residential Dev. Drainage Design, Dwg 6129-1003, Rev G, Dated: 30.10.2026, Author: Bellamy Roberts

Planning to note, the proposed Package Treatment Plant and the proposed Attenuation Basin are both located outside of the red line boundary. The applicant must confirm whether the land on which both of these components stand (and the resulting outfall for the management of foul and surface water) lies within the applicants ownership boundary or otherwise the applicant must provide evidence of permission from the relevant landowner(s).

The calculations use outdated rainfall methodology. Please use FEH22 not FSR. CV winter and summer values must be 1.

The distance between the proposed Package Treatment Plant and areas of permeable paving and the attenuation basin, is less than 10m. The applicant must provide a clearance of at least 10m between the PTP and areas of permeable paving and the attenuation basin.

It is unknown whether 10% allowance for urban creep has been considered.

Proposed runoff rates are to be 1.1l/s, which is considered to be low. The National Standards now recommend that runoff rate is either matched to the greenfield 1 in 2 year runoff rate (100% AEP) (this rate is unknown) OR 3l/s/Ha whichever is greater) 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 applicant must confirm.

For the attenuation basin, a freeboard allowance of only 5mm has been provided. It is expected minimum freeboard to be 300mm.

Unless knowledge of winter groundwater levels are provided, all areas of permeable hardstanding must be lined. (This detail has not been considered within the construction

drawings). Similarly, the attenuation basin must be lined also, preventing groundwater ingress and risk of contamination to groundwater.

An assessment of the receiving ditch at outfall has not been provided.

No maintenance and management strategy has been provided.

Adjustments need to be made to the drainage strategy, which considered the point above. Until such a time as the Drainage Strategy is revised, HDC Drainage are unable to consider 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.

The applicant should consider the Main Comments Section below, to inform them what information is expected to be submitted for review within an amended Drainage Strategy. Until such a time as is information is received, HDC Drainage must object to the proposed Drainage Strategy.

MAIN COMMENTS:

- The applicant must provide a site-specific assessment of flood risk, even where a full flood risk assessment is not required.
- 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 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.
- If a ditch and/or watercourse is present on site, an assessment of each feature must be provided, to identify whether the feature is expected...
  - to contain flowing water throughout the year (unless there is a drought or an unusually long period of dry weather). The range of expected water levels should be provided.
  - to seasonally dry up
  - to stay dry for most of the year.
- If a ditch and/or watercourse is present on site, context must be provided regarding the connectivity of the ditch and/or watercourse to waterways within in the wider landscape, as well as influences which might affect water levels in the feature, both upstream and downstream.
- If a ditch and/or watercourse is present on site, the applicant must demonstrate that a visual inspection of the ditch and/or watercourse has been undertaken, providing a detailed summary of site conditions on the day of assessment with supporting photographs.
- If a ditch and/or watercourse is present on site or along the boundary of the site, the applicant must demonstrate ownership of the ditch/ watercourse.
- If a ditch and/or watercourse is to be the intended outfall location for surface water and/or treated effluent from a Package Treatment Plant (PTP) / Sewage Treatment Plants System, the applicant must obtain permission from the landowner for use of that feature.
- 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. Please be advised, if the infiltration rate is acknowledged to be poor on site (following BRE365 infiltration testing at the location and depth of the proposed devices) Percolation Testing (BS6297) is advised, as this will be a requirement of the Environment Agency should the applicant need to apply for an environmental permit.
- 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.
- Whilst not a mandatory requirement, HDC Drainage welcome and encourage the consideration of rainwater harvesting within the proposed development, for non-potable use.

ANY RECOMMENDED CONDITIONS:
NA

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	18/11/2026