TO:	Horsham District Council – Planning Dept
LOCATION:	Parsons Field Stables Pickhurst Lane Pulborough West Sussex, RH20 1DA
DESCRIPTION:	Change of Use of land for the stationing of 2 static caravan for residential purposes and the erection of a stable building for private use together with the formation of hardstanding and associated landscaping.
REFERENCE:	DC/24/0256
RECOMMENDATION:	More information required

SUMMARY OF COMMENTS & RECOMMENDATION:

Horsham District Council previously responded:

- with an 'Objection/More information' to this application on 15th March 2024,
- with a request for 'More information' to this application on 8th July 2024 and
- with a request for 'More information' to this application on 4th December 2024.

The following supporting documents have been reviewed:

- Drainage Strategy (Aegaea, 28/03/2025, Ref: 7554_RH20_Pulborough_07)

Documents reviewed as part of the 04/12/2024 response:

- Flood Risk Assessment (FRA) (Aegaea, 15/11/2024, Ref: AEG6513_RH20_Pulborough_01)

Documents reviewed as part of the 08/07/2024 response:

- Additional Drainage and Rainwater Harvesting details letter (Manorwood, 19/06/2024)
- Sewage Treatment Tank (Premier Tech, Installation and Servicing Guide, REWATEC, 19/06/2024

Documents reviewed as part of the 15/03/2024 response:

- Technical Note 1: Water Neutrality Statement (Motion, 09/02/24, P1, Reference: 1mvpul/2401053)
- Existing Block Plan (Manorwood, 14/02/24, 000, Reference: 2311PA_R0.0_001)
- Proposed Block Plan (Manorwood, 14/02/24, 000, Reference: 2311PA_R0.0_002)

We have reviewed the evidence provided by the applicant in support of the planning application for the addition of two static homes and one block of stables. The proposals will result in an increase in impermeable area and **therefore more information is required** due to the absence of an acceptable drainage strategy and additional information relating to:

- Whether the site drainage meets the requirements of the NPPF, PPG SuDS Non-Statutory Technical Standards (NSTS) (March 2015), the West Sussex LLFA Policy

for the Management of Surface Water (2018), and the Horsham District Planning Framework (2015) – Policy 38

The submitted Drainage Strategy information is not wholly compliant with current policy and the requirements of the approving authority, though is a robust approach to the design of the scheme and the matters of compliance can be resolved through the detailed design submission as part of a suitable planning condition. Therefore, if HDC is inclined to approve this application, we require the following conditions to be placed on the approval, should it be granted by the LPA.

'No development shall commence until a drainage strategy detailing the proposed means of foul and surface water disposal, using the methodology previously agreed with the approving authority, 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).'

MAIN COMMENTS

We have reviewed the additional evidence provided by the applicant in support of the planning application. While the applicant has addressed many of the previous shortfalls in information provision, the following information is still required, which can be provided by way of a worded condition (see above).

- Pre- and post-development permeable and impermeable areas must be provided.

- 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 + Climate Change storm events (the 100% AEP, 3.33% AEP, 1%AEP incl. climate change have been provided in Appendix D of the Drainage Strategy, but not in the main report)
  - greenfield runoff rate (Q_{BAR})
  - water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event.

  According to section 24.3 in the SuDS Manual (2015), FEH methods should be the preferred approach for developing runoff estimates for us in surface water management design. Therefore, the drainage calculations provided in Appendix D of the drainage strategy, as well as the proposed Drainage Layout (if required) must be updated accordingly. If an alternative runoff estimation method is proposed to be used, then the applicant must provide an adequate explanation as to why this is being used.

- The Drainage Strategy shows the proposed outfall discharging into the existing ditch. It also mentions that further surveys are required to confirm the outfall's exact location, dimensions and levels prior to construction.

The outfall's exact location, as well as its dimensions and levels must be confirmed. It must be also confirmed whether an allowance for urban creep has been taken into consideration (and if not, it must be considered).
The required and proposed volumes of storage and sizing of the proposed drainage features must also be provided.

- Evidence of a third-party agreement to discharge surface water into their drainage system (ditch) must be provided.

- A Management and Maintenance plan has been provided. The Drainage Strategy also notes that the surface water drainage network will be managed throughout the lifetime by the owners of the proposed development. It must be clarified whether this includes the permeable paving.

  The proprietary device manuals, for all drainage features and SuDS devices must also be provided.

- Consideration of how exceedance flows for events greater than the 1 in 100 year + 40% Climate Change event will be managed and mitigated on site without significantly increasing flood risks (both on site and outside the development) must be provided.

- The foul drainage proposed outfall destination must be prioritised as per the hierarchy of foul drainage (requirement H1 of the Building Regulations 2010). In the first instance this is into the existing public foul sewer network if available. There may be existing sewers within the vicinity of the site that have now been made public due to the blanket adoption of sewers undertaken after the legislation change in 2011. It is recommended that survey work be undertaken to identify any potential assets near the site that could be a point of connection for foul water and the design adjusted accordingly. If no assets are discovered, then suitable evidence and justification of the proposed method of foul water disposal should be submitted.

- A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H must be provided, including:
  - A detailed drainage layout, confirming the outfall location.
  - Confirmation of permission to connect to a private/public sewer, if applicable, must also be provided.

- Confirmation of an environmental permit for foul discharges, if relevant, should also be provided

- The Flood Risk Assessment (FRA), dated 15/11/2024, identified that in the modelled 1 in 30 year, 1 in 100 year and 1 in 1000 year pluvial storm events, most of the site is shown to be located outside the flood depths for each of the abovementioned events, except the south-eastern site boundary. Consequently, the proposed development footprint is shown to be located outside the modelled flood depths. However, on 28/01/2025, the EA released the New National Flood Risk Assessment (NaFRA) and 'Risk of flooding from surface water' data and therefore, the outcomes of the FRA related to the surface water flood risk must be updated, if required.

- The FRA also concluded that based on the nature of the proposed development, stables and static home and that all analysed sources of flooding were low risk, no mitigation measures are recommended. However, following the abovementioned updates on flood risk mapping, the conclusions of the FRA must be updated, if required.

ANY RECOMMENDED CONDITIONS:

See above

NAME:	C Bakopoulou E Edney A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	09/04/2025