

TO:	Horsham District Council – Planning Dept
LOCATION:	Land South Of The Bowling Green The Daisycroft Henfield West Sussex
DESCRIPTION:	Erection of 9no. detached dwellings with associated parking, landscaping, hardstanding, access and associated works.
REFERENCE:	DC/26/0006
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: • SuDS & Foul Drainage Assessment. Dated: December 2025, Author: GTA Civils & Transport Limited. • Letter of correspondence from Place Services to Horsham District Council, Dated: 18th February 2026. • Preliminary Ecological Appraisal, Survey date: 1st October 2025, Author: Arbtech. • Design and Access Statement, Dated: December 2025, Revision: B, Author: Twenty-20 Architecture. HDC Drainage require 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: • Whilst the applicant has stated that the assumed infiltration rate relies on results from a previous soakage test at this site, which are “within the public domain”, HDC Drainage have not found other planning applications associated with this site to support this claim. In support of this application however, it is fully expected that a new BRE 365 test is conducted, and the results are submitted to support this application, at this stage, for this project. It is not considered suitable to rely on the results of previous tests from previous applications. This is particularly prudent, given the drainage strategy currently relies on point infiltration. • HDC Drainage believe opportunities have been missed to explore the use of SuDS further. The Drainage Strategy currently relies on point infiltration to manage the sites surface water. Whilst a soakage rate of 4.4x10⁻⁵m/s has been considered for the infiltration rate of the soakaway, (which is marginally greater than the minimum acceptable rate of 1x10⁻⁶ m/s for point infiltration), HDC drainage advise that the drainage strategy consider the use of additional SuDS within a ‘SuDS management train’, including raingardens, swales, attenuation ponds etc... exploring opportunities for a natural approach to managing surface water, which might assist in the creation of habitats for nature and wildlife, as well as create a pleasant liveable environment. An integrated approach between SuDS and Landscape should be considered. If a different approach to surface water management is not considered, justification for this decision must be provided. • Whilst not a mandatory requirement, HDC Drainage welcome and encourage the consideration of rainwater harvesting within the proposed development. • The results of winter groundwater monitoring must be provided to support this application. The applicant must demonstrate that appropriate measures have been taken to protect groundwater from pollution.	

- The applicant must demonstrate how the exceedance routes will be managed on site, showing consideration for properties both on and off site.

Further details required within a full foul and surface water Drainage Strategy includes (but is not limited to):

- The applicant must provide a site-specific assessment of flood risk, even where a full flood risk assessment is not required. *HDC Drainage note the site shows no surface water flood risk as shown on the GOV.UK 'Flood Map for Planning'.*
- 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. *HDC Drainage note levels have been provided and some understanding of site characteristics.*
- 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. *HDC Drainage note these areas have been provided.*
- 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. *HDC Drainage note that the Drainage Strategy has provided justification for seeking alternative surface water discharge methods.*
- 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. *HDC Drainage note that suitable calculations, input parameters and system design settings have been demonstrated.*
- 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 testing in accordance with BRE365, at the location and depth of the proposed devices. **HDC Drainage consider that BRE365 infiltration testing is necessary to support this application. The applicant must provide the results of this test and include the outcome within their report.**
- The applicant must provide evidence of measures to prevent pollution of the receiving groundwater and/or surface water. **HDC Drainage note that this has not yet been provided.**
- 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. **HDC Drainage would like the applicant to consider exceedance routes further. Sufficient detail has not been provided to demonstrate that the existing development to the south is protected from flooding as a result of these exceedance routes.**
- 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:

- 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:

Conditions **ARE NOT** recommended at this stage.

NAME:

A.Furness

DEPARTMENT:

Horsham District Council - Drainage

DATE:

27/02/2026