

TO:	Horsham District Council – Planning Dept
LOCATION:	Copped Hall Farm Okehurst Lane Billingshurst West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3 and 4 to approved application DC/19/1257.
REFERENCE:	DISC/26/0016
RECOMMENDATION:	Condition 3: More Information
SUMMARY OF COMMENTS & RECOMMENDATION: <u>History of previous HDC Drainage Responses to the proposed development:</u> In reference to DISC/22/0270, the following documents have been reviewed: - Email exchange from HDC Drainage Engineer to HDC Planning Officer, Dated: 18/10/2022, containing following statement: <i>"The information submitted is sufficient to recommend discharging Condition 3 imposed on this application."</i> Drainage Plan: Proposed Drainage, Drawing No: 575/02 (unknown author, unknown date), was initially submitted within this application. In reference to DISC/25/0072, the following documents have been reviewed: - HDC Drainage Response, Dated: 01/04/2025, containing the following statement: <i>"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..."</i> - Notably, Drainage Plan: Proposed Drainage, Drawing No: 575/02 (unknown author, unknown date), was also submitted within this application as well. <u>In reference to DC/19/1257, the following documents have been reviewed:</u> - Planning, Design and Access Statement (DC/19/1257), Dated: (undated), PROwe Planning Solutions - Appeal Decision (DC/19/1257), Dated: 15th July 2020, Martin Small. <i>Condition 3: 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> <u>For this application, the following documents have been reviewed:</u> Drainage Plan: Proposed Drainage, Drawing No: 575/02 (unknown author, unknown date) - Letter of correspondence from Bespoke Property Consultants to Horsham District Council, Dated: 16th January 2026. Due to the absence of an acceptable drainage strategy, 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.	

PLEASE NOTE: in reference to the same submitted **Drainage Plan** for **DISC/25/0072**, a bespoke response was provided by HDC Drainage (01/04/2025) which clearly specified the level of detail required to demonstrate that the Drainage Strategy is acceptable. HDC Drainage recommends that the applicant review this response and provide the detail requested, to support this application. **Further submission of the same plan without the requested information to support this application, will receive an objection from HDC Drainage, because this is not considered a suitable level of detail at this stage of the planning process.**

MAIN COMMENTS:

An Acceptable Drainage Strategy should provide the following level of detail:

- 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.
- 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.
- Where infiltration testing has not been undertaken, provide an infiltration assessment, supported by a desk-based assessment of soil types, geology and suitability for infiltration potential (See the Horsham District Council Local Plan evidence base), together with an alternative option for surface water disposal.
- 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.
- 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.
- 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

- Whilst not a mandatory requirement, HDC Drainage welcome and encourage the consideration of rainwater harvesting within the proposed development.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:

A. Furness

DEPARTMENT:

Horsham District Council - Drainage

DATE:

11/02/2026