

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Marches Road Marches Warnham Horsham
DESCRIPTION:	Approval of details reserved by conditions 3, 4 and 5 to approved application DC/23/1141.
REFERENCE:	DISC/26/0216
RECOMMENDATION:	Objection
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: - Sustainable Drainage Strategy – Rev P01. Dated: 09 July 2026. Author: Curtins. The 'Proposed Drainage Layout' Plan, Drawing No: 089276–CUR–XX–XX–D–C–92211, Rev P01, states: - SW5: <i>'Depth and location of existing drain subject to on-site confirmation. Drainage Strategy to be reviewed following confirmation. If necessary, additional flows to be directed through the pump.'</i> At Discharge of Conditions, HDC Drainage will not overlook unconfirmed information regarding the location, invert levels of, or condition of the existing drain, which is to be the intended outfall for the site's entire drainage strategy. Concerns regarding pump discussed below. <i>'If level of existing drain at SW5 does not allow a gravity connection from SW8, flows from SW8 to be directed to a swale in this location and allowed to run-overland to the watercourse to the adjacent field'.</i> It is unacceptable to allow the drainage strategy to permit overland flows into a neighbouring field. The 'Sustainable Drainage Strategy' states <i>'It is feasible that the north outlet point may provide a suitable discharge location for some of the flows from the development. However, given the site topography, it is considered unlikely that this will be able to accommodate all flows from the site via a gravity connection.'</i> ...<i>'a pumped solution may be required.'</i> P8. A bespoke Environmental Permit from the Environment Agency would be needed for this Drainage Strategy – HDC Drainage do not believe this Drainage Strategy, which includes the use of a pump to discharge water into an ancient woodland, would be considered acceptable. HDC Drainage would strongly advise an applicant against perusing a drainage strategy promoting this. The applicant has specified the use of two abutting Private Treatment Systems (one for plots 1-4 and one for plot 5) one of which is proposed to use a pump and rising main, combining with the surface water runoff network, before discharging into in the <i>'existing drain'</i> which reached the outfall in the Ancient Woodland. The use of two Private Treatment Systems immediately abutting one another is inappropriate and will not be permitted. Why has one larger unit not been proposed? HDC Drainage note the position of <i>'sampling chambers'</i>. Do these contain shut-off valves for use in the event of failure? The use of non-return valves has not been discussed or made clear on the plans. This needs to be made clear. Again, HDC Drainage do not believe the use of a pump to discharge treated effluent into an ancient woodland, would be considered acceptable. HDC Drainage would strongly advise an applicant against perusing a drainage strategy promoting this.	

Concerns regarding discharge rate:

- The strategy has stated the discharge rate of the sites surface water strategy will be '9.9l/s... for storms up to the 100-year event + 45%'. Whilst this 'represents a 50% betterment on the combined peak piped flows out of the site from surface water' against the applicant's hydraulic model for the existing Drainage Infrastructure, this is in reference to the 1 in 100-year brownfield runoff rate, which is not considered acceptable. Discharge rates cannot exceed 50% of the calculated 1 in 1-year brownfield runoff rate, which will only be considered acceptable as a last resort.
- HDC Drainage note that the applicant may have considered the discharge rate from site to be unrestricted up to the 1 in 100-year event, due to the *assumed* diameter of the existing drainage infrastructure on site, as 'The diameter and level of these pipes is unconfirmed'. This approach is not accepted. HDC Drainage will only accept Brownfield Run-off rates calculated using the Modified Rational Method. The applicant must provide evidence of their working, calculating the peak brownfield rate for the 1 in 1-year storm event, 1 in 30-year storm event, and the 1 in 100-year storm event.
- Currently, the drainage strategy allows surface water to flow off site at an unrestricted rate, for storm events far greater than the **1 in 1-year storm event**. For reference, (as the brownfield 1 in 1-year run off rate is currently unknown) 9.9l/s is a 1314.29% increase or more than **13x the existing 1 in 100-year greenfield runoff rate**, which is 0.7l/s.
- 9.9l/s is also only discussed in relation to the Surface Water Drainage and does appear to account for the output of the Foul Package Treatment Plants, which the strategy has stated will be an additional 1-2l/s from each unit.
- With the consideration of Surface Water Attenuation on site (which the applicant has currently not provided), this discharge rate could be brought down significantly. As this has not been explored or discussed, HDC Drainage will not consider the current discharge rates to be acceptable, especially as the receiving outfall feature is a watercourse in an ancient woodland.

Rainfall calculations have not used recent rainfall data. FEH22 or later must be used and Winter and Summer values must be 1.

Urban Creep has not been considered.

A CCTV Survey has not been undertaken to ascertain the condition of the existing drainage infrastructure.

Fundamentally, the condition and location of the 'existing storm drainage' and the condition of the outfall and receiving outfall feature for the sites surface water (the watercourse located in the neighbouring Ancient Woodland') has not been determined. The discharge rate into the Ancient Woodland watercourse has not been calculated appropriately and currently would exceed 13x the greenfield runoff rate. The use of surface water attenuation has not been provided or discussed. The contingency plan, to divert water into a 'swale' allowing water to 'run-overland to the watercourse to the adjacent field' is entirely unacceptable. As such, HDC Drainage objects as the Drainage Strategy does not meet 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.

To overrule an objection from HDC Drainage, the applicant must provide responses to the comments issued above and may additionally wish to consider the requests outlined in the Main Comments Section below, revising their Drainage Strategy accordingly.

MAIN COMMENTS:

For reference, HDC request the following within an acceptable drainage strategy:

- 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.
- If restricting runoff rates back to the 1 in 1-year greenfield runoff rate is considered unreasonable, HDC Drainage may allow discharge rates to be restricted to as close as feasibly possible, limiting up to a 50% betterment of the brownfield 1 in 1-year runoff rate as a last resort.
- 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.
- If a ditch and/or watercourse is present on site, and is the intended outfall location for surface water and/or treated effluent from a Package Treatment Plant (PTP) / Sewage Treatment Plants System, 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, and is the intended outfall location for surface water and/or treated effluent from a Package Treatment Plant (PTP) / Sewage Treatment Plants System, 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, and is the intended outfall location for surface water and/or treated effluent from a Package Treatment Plant (PTP) / Sewage Treatment Plants System, 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 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 or otherwise demonstrate ownership of the ditch/ watercourse.
- 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.
- 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:	05/08/2026