

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: Letter of correspondence from Southern Water to Horsham District Council, Dated: 8th April 2026 Note: No further Drainage Information has been provided since the last HDC Drainage consultation response requesting more information. The comments in the Main Comments section below include those requests for information which are still outstanding from Drainage Comments issued 27/02/2026. 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):

- 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) – **The applicant must consider the comments provided by Southern Water, providing evidence of further communication with Southern Water and detailed plans of the proposed Foul Drainage Strategy. HDC Drainage will review to ensure there are no conflicts or outstanding concerns about the interrelationship between the foul and surface water drainage strategies.**
- 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 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
- For the consideration of the applicant, HDC Drainage will (at a later date) recommend the following condition is applied to any future Planning Decision Notice: Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development.

ANY RECOMMENDED CONDITIONS:

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

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	24/04/2026