

TO:	Horsham District Council – Planning Dept
LOCATION:	Fryern Park, Fryern Park Farm Fryern Road Storrington West Sussex
DESCRIPTION:	Change of use of land to mixed use for the keeping of horses (existing) and residential Gypsy/Traveller caravan site comprising 4no. pitches, each containing one static caravan and one tourer, together with the erection of two ancillary amenity buildings.
REFERENCE:	DC/26/0151
RECOMMENDATION:	Objection
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: • Drainage Design Strategy, Dated: June 2026, Author: EAS Ltd. HDC Drainage are unable 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 19, Policy 23, Policy 35 and Policy 38. As such HDC Drainage Object. The applicant has not demonstrated that the proposed development is able to manage surface water and treated foul effluent successfully or to the standard expected of <u>all</u> new development. Insufficient information has been provided to demonstrate how groundwater will be protected from contamination. Insufficient information has been provided to demonstrate that the proposed development will not present a flood risk, impacting neighbouring land and properties to the south / south-west. The applicant may wish to revise their Drainage Strategy or provide further information to support their application, which HDC Drainage are happy to review, however, without the requested information outlined in the Main Comments section below, HDC Drainage will be unable to approve of this scheme. Of concern is that there are several constraints on site which may restrict Drainage Solutions for the intended development.	
MAIN COMMENTS: • The Drainage Design Strategy states: <i>"The foul sewerage drainage scheme for the dwelling comprises installation of a replacement sewage treatment plant, with discharge into the drainage ditch along the site's western boundary as existing"</i> and <i>"Drainage ditches were located along the western side of the access road immediately west of site, and along the south of Fryern Park road beneath the hedging."</i> However, no plans have been provided to identify how or where the treatment plant will be connected to the watercourse/ditch, no plans identify how the watercourse/ditch is connected within the wider drainage network, and no images have been provided to indicate the condition of the watercourse/ditch. The applicant should provide further information as outlined above and provide evidence of ownership of the ditch or permission from the landowner to connect to the ditch, which will need to be done so through a culvert under the road, which will also require permission/ formal consent from the landowner. The applicant should be advised, discharge to roadside ditches will generally not be permitted, unless there is explicit permission from the landowner.	

- QUESTION: If BRE365 Infiltration Testing showed that infiltration to ground was possible (which the surface water drainage strategy is reliant upon) why does the Foul system intend to drain into a ditch/ watercourse? Why has discharge to ground not been considered for this application or the creation of a drainage field?
- It is understood that the applicant wishes to use the location of a previous sewage treatment plant, for the position of the proposed treatment unit, however, this is sited too close to the property boundary. HDC Drainage would expect to see a minimum distance of 5m between the sewage treatment plant and the property boundary. In this instance, the application has also stated that the treated effluent from this unit is to discharge into an existing ditch/watercourse. Approved Document H states: *"The discharge from the water treatment plant should be sited at least 10m away from watercourses and any other buildings."* As such, HDC Drainage expect to see this reflected in the drainage strategy layout – providing a minimum distance of **10m** between a watercourse and the position of the sewage treatment plant, which may result in the need to push the treatment plant back further away from the property boundary.
- The soakaway and the sewage treatment plant are currently sited too close together. HDC Drainage advise that the distance between the soakaway and the package treatment plant is increased, to provide a minimum distance of **10m** between the two. Furthermore, it is considered unwise to locate the soakaway immediately 'upstream' of the sewage treatment plant (as shown in current proposal).
- The soakaway should be positioned a minimum distance of 2-5m away from a boundary and at least 5m from a building. As such, HDC Drainage advise the soakaway is positioned **2-5m** from the red line boundary and **5m** from any building.
- 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. The Drainage Design Strategy states: *"Percolation testing comprised the excavation of a trial pit to 1.0 m below ground level in order to examine the geology at the site."* HDC Drainage do not believe the test was carried out properly. Testing occurred during June, not during the winter months as necessary to obtain fair results. Digging only 1m below ground level does not reflect the depth of a proposed soakaway and is an insufficient depth to identify the presence of groundwater. It is recommended to run the test as requested and then dig 1m further, to identify whether groundwater is present. This is essential for the installation of a soakaway, to protect groundwater from contamination. As such, **the applicant has not provided sufficient evidence of measures to prevent pollution of the receiving groundwater and/or surface water.**
- If a ditch and/or watercourse is present on site and/or is to be 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.
 - 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.

- 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. - The applicant must demonstrate ownership of the ditch/ watercourse. - The applicant must obtain permission from the landowner for use of that feature. • 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.	
ANY RECOMMENDED CONDITIONS: NA	
NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	03/07/2026