

TO:	Horsham District Council – Planning Dept
LOCATION:	Downsview Paddock New Hall Lane Small Dole West Sussex
DESCRIPTION:	Proposal for a single pitch settled gypsy accommodation site (Retrospective).
REFERENCE:	DC/25/1996
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: • PLANNING, DESIGN and ACCESS STATEMENT (03/12/2025) • Application for Planning Permission (03/12/2025) We have reviewed the evidence provided by the applicant in support of this planning application DC/26/0024 and we require more information to support the proposals 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 38.	
MAIN COMMENTS: • The applicant has proposed that the surface water runoff from the site be discharged via infiltration. Geology identified by online British Geological Survey records, and infiltration suitability provided in the West Sussex SFRA, for the site and surrounding area, indicate there is not potential for infiltration at this site. • Suitable justification and evidence for this method of disposal has not been provided, and the applicant should explore surface water discharge in line with the discharge hierarchy in accordance with Building Regulations Part H. If infiltration rates are found to not be suitable then alternative methods of surface water disposal should be sought. • As infiltration has been proposed as a method of surface water disposal, infiltration testing, undertaken in the winter period at the location and depth of the proposed structures, in accordance with BRE Digest 365, CIRIA R156 or another approved method, should be provided via on site testing to support the design. Tests should be undertaken during winter / early spring when ground water levels are typically highest; if groundwater levels are influenced by the tide, then tests should be undertaken over a highwater spring tide. • The applicant has proposed runoff will infiltrate naturally through the ground without the use of a designed infiltration structure. This is not acceptable and an infiltration structure is required for discharge into the ground and should be designed in accordance with current legislation and best practice. • For the purpose of design, the percolation rate must be applied to the sides of any proposed infiltration structure only and the rate for the base must be zero, unless otherwise agreed with the LPA engineer. This does not apply to infiltration basins or permeable pavements, whereby the percolation rate is applied to the base only.	

- The infiltration structure should drain 50% of its total volume in 24 hours or less for the 1 in 10 year event and for the 1 in 100 year event (unless otherwise agreed with the LPA engineer) in order to provide spare capacity for subsequent storms.
- The applicant should provide flow and volume rates with supporting evidence, for greenfield and brownfield sites as appropriate (see the UKSUDS.com tool): Existing runoff rates should be provided for the 100% Annual Exceedance Probability (AEP), 3.33% AEP and 1% AEP storm event and include the value of Q_{bar} .
- The applicant should provide post development discharge rates for the 100% AEP, 3.33% AEP, 1% AEP, 1% AEP + Climate Change storm events.
- The runoff from the proposed development should where possible be restricted to the greenfield 1 in 1 year runoff rate during all events up to and including the 1 in 100-year rainfall event including adjustments 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, not exceeding the flow rate generated from a 50% improvement on the 1 in 1 year brownfield runoff rate of the existing site.
- Justification for any flow rate greater than the 1 in 1 year greenfield runoff rate should be provided, and the final rate agreed with the local planning authority prior to determination of the planning application to ensure a viable connection can be made to a receiving watercourse or surface water sewer.
- 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 storm event with climate change is safely contained within the site without risk to persons or property.
- Should a positive discharge from site be used, control orifices 50mm or less must be robustly protected from blockage risk. Thorough assessment of the risk of blockage for all flow controls and appropriate mitigation should be provided. The flow control and any blockage mitigation should be included within a Maintenance Schedule.
- The applicant has indicated that surface water from the proposed roof will discharge to a rainwater harvesting (RWH) system. While the use of RWH is welcomed, the operational volume within the unit cannot be used for surface water attenuation, as there is no guarantee of the water use within the property or the availability of the storage. Therefore, evidence is required to show the overall surface water system has sufficient capacity to provide the necessary stormwater attenuation without reliance on the RWH system. For RWH design, refer to BS EN 16941-1 2018 On-site non-potable water systems, and Chapter 11

of The SuDS Manual to demonstrate additional stormwater attenuation compliance.

- The applicant should provide a detailed surface water drainage strategy, including: 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 applicant should provide a foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H, including a detailed drainage layout, showing pipe sizes, materials, gradients and outfall location.
- If the intention is to discharge the treated foul water to the surface water system then a fully compliant waste water treatment unit must be selected and specified. The system should be fitted with a downstream shut-off valve and sampling point to provide protection for the receiving surface water network should the unit fail.
- The applicant should provide evidence of measures to prevent pollution of the receiving groundwater and/or surface water assets. Pollution control and water quality measures should be provided in accordance with the Simple Index Approach as outlined in CIRIA C753 The SuDS Manual.
- The applicant should provide a Maintenance and Management Plan including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.
- The applicant should provide drawings showing conveyance routes for the 1 in 100 year plus climate change event and consideration of how exceedance flows for events greater than this will be managed and mitigated on site without significantly increasing flood risk (both on site and outside the development).

ANY RECOMMENDED CONDITIONS: More information is required before conditions can be recommended.

NAME:	S Goddard G Nelmes A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	25/03/2026