TO:	Horsham District Council – Planning Dept
LOCATION:	Copped Hall Farm Okehurst Lane Billingshurst West Sussex RH14 9HR
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3, 4 and 7 to approved application DC/19/1257
REFERENCE:	DISC/25/0072
RECOMMENDATION:	Not satisfied: More information required

SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the following information:

- Drainage Plan (unknown author, unknown date, uploaded on 03/03/2025, Drawing no: 575/02)
- Remediation Verification Sampling report (Adeptus Environmental, February 2025, Report no: A220403-R03)

Condition 3 (related to foul and surface water disposal): *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.*

Documents submitted as part of the DC/19/1257 planning application

- Existing and Proposed Plan (Manorwood, Issued: 21/06/2019, Ref: 1905CO / A1)
- Southern Water letter (Southern Water, 12/07/2019, SW ref: PLAN-028679)

We have reviewed the evidence provided by the applicant in support of the planning application. 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 and additional information relating to:

- Whether the site drainage meets the requirements of the NPPF, PPG SuDS Non-Statutory Technical Standards (NSTS) (March 2015), the West Sussex LLFA Policy for the Management of Surface Water (2018), and the Horsham District Planning Framework (2015) – Policy 38

MAIN COMMENTS:

The applicant must provide the following information:

- Site drainage patterns – assessment of the current drainage patterns and clarification of the proposed drainage patterns entering, within, and leaving site including an understanding of how surface water would flow across the site in normal and exceedance event conditions (see to GOV.UK Long term flood risk mapping). This would include drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change for the existing and proposed site and surround.

- Clarification of the pre- and post-development permeable and impermeable areas with supporting catchment plans and calculations.

- The Drainage Plan shows that 4 soakaways are proposed to be installed. In case the proposed surface water discharge via infiltration is proven to be unviable, then an alternative surface water drainage method must be provided. In that case, provide the following flow and volume rates with supporting evidence, for both greenfield and previously developed sites (see the UKSUDS.com tool):
  - 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 + Climate Change storm events;
  - greenfield runoff rate (Q_{BAR});
  - water storage capacity volumes of the proposed drainage features to attenuate the 1% AEP + Climate Change storm event

- The Drainage Plan shows that 4 No. rubble-filled soakaways are proposed to be installed (1.2m x 1.2m x 1.2m). It is proposed that the soakaways will be installed 5.0m from any building. However, no further information has been provided on these proposed soakaways. If rubble-filled soakaways are to be proposed, then the construction and void ratio of these structures must be clearly detailed to ensure that they provide sufficient attenuation.

  Where infiltration discharge methods are proposed, provide infiltration testing in accordance with BRE365, at the location and depth of proposed devices. Minimum proven infiltration rates are $1x10^{-6}$ m/s, as per The SuDS Manual (C753). Any infiltration structure should have half drain down times less than 24 hours and be constructed a minimum of 1.0m above the highest groundwater level.

- Fully designed surface water management strategy must be provided including:
  - the aim to achieve and better greenfield runoff rates and adherence to the drainage hierarchy.
  - rationale for SuDS selected in line with the West Sussex LLFA Policy for the Management of Surface Water (2018), Horsham District Planning Framework (2015) – Policy 38 and Industry best practice, such as The SuDS Manual (C753)

- Evidence of measures to prevent pollution of the receiving groundwater and or/surface water. Proposals must demonstrate the development's risk and mitigation provided for water quality risks to surface water and groundwater bodies. This is required to comply with SuDS Policy 7: Safeguard Water Quality as per Section 6.1 of the LLFA Policy. Generally, an appropriate assessment to provide is the Simple Index Approach (SIA) of Section 26 in SuDS Manual (CIRIA C753).

- Detailed surface water drainage strategy, including supporting calculations, detailing outfall location, runoff rate/s as per the LLFA's SuDS Policy 3, required and proposed volumes of attenuation storage, freeboard and sizing of all drainage features, should be provided. A detailed drainage layout plan should reference all assets showing characteristics such as; pipe sizes and materials, gradients, and manhole type, depth, size, SuDS dimensions, materials and depths.

- If applicable, provide evidence of a third-party agreement to discharge surface water.

- Maintenance and Management Plan including access requirements, maintenance frequency and responsibility, and proprietary device manuals, for all drainage features and SuDS devices.

- Plan shows an indicative foul water network to the west of the Site, which will then discharge via a 2.7m³ Kalrgester tank to the existing drainage ditch. Further information on this system should be provided.

- The Drainage Plan shows that a 'Klargester' septic tank is proposed to be installed in accordance with manufacturers specification.

  In relation to foul water disposal, the Southern Water letter (part of the planning application DC/19/1257) stated that '*The applicant has not stated details of means of disposal of foul drainage from the site. There is no public foul sewer in the vicinity of the site. The applicant is advised to examine alternative means of foul sewage disposal.*
  The foul water treatment unit should be appropriately sized and specified and a suitable outfall determined, if possible, with the associated permit from the Environment Agency and/or Lead Local Flood Authority.

  A foul water drainage strategy, with supporting flow calculations in line with Sewerage Sector Guidance and/or Building Regulations Part H must be provided, including:

  - A detailed drainage layout, showing pipe sizes, materials, gradients and outfall location.
  - Confirmation of permission to connect to a private/public sewer, if applicable, must also be provided.
  - Full details of any infiltration structure / drainage field, designed in accordance with current legislation and best practice, if relevant.
  - Confirmation of an appropriate environmental permit for foul discharges to ground or surface water assets, if relevant, should also be provided.

  The Southern Water correspondence dated 12/07/2019 indicates there may be existing sewers within the vicinity of the site that have now been made public due to the blanket adoption of sewers undertaken after the legislation change in 2011. It is recommended that survey work be undertaken to identify any potential assets near the site that could be a point of connection for foul water.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	C Bakopoulou L Derrick A Johnson
DEPARTMENT:	Horsham District Council - Drainage
DATE:	01/04/2025