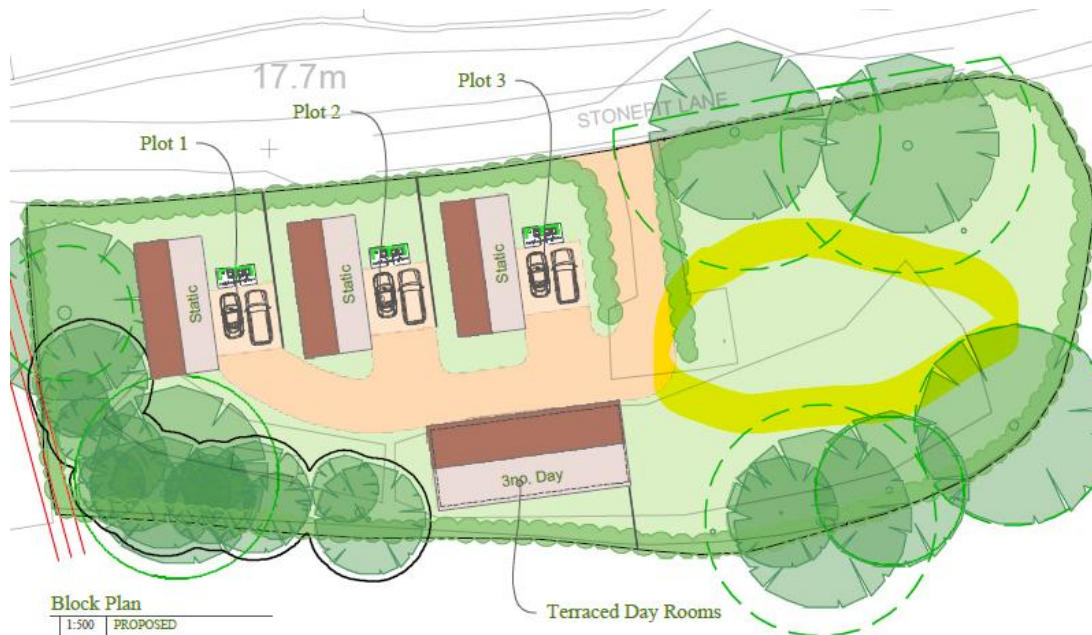
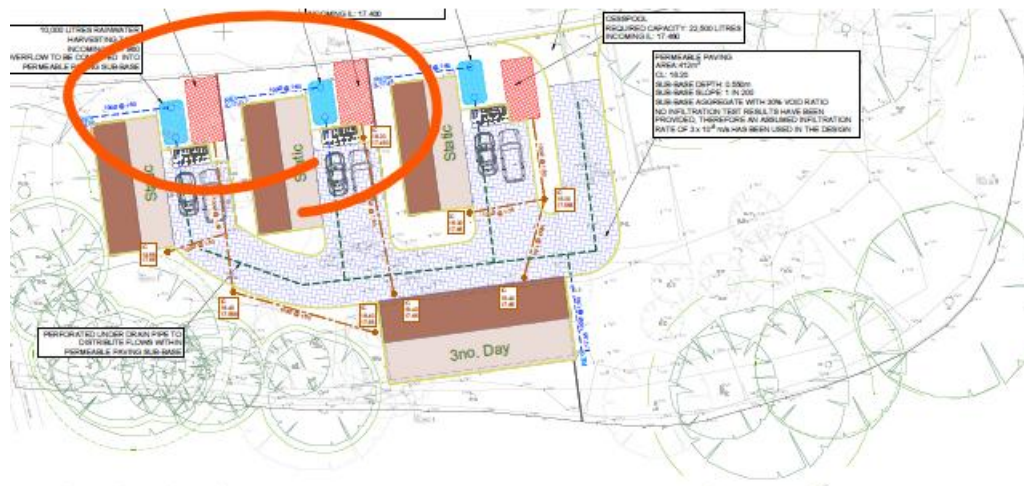


TO:	Horsham District Council – Planning Dept
LOCATION:	Land Parcel at 520128 116244 Stonepit Lane Henfield West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3 and 4 to approved application DC/25/0583.
REFERENCE:	DISC/26/0017
RECOMMENDATION:	Condition 3: Objection
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: - Decision Notice for DC/25/0583, Dated: 14/01/2026. - Drainage Strategy, Reference: AEG6735_BN5_Henfield_07_A, Issue 2, Dated: 10/04/2025, Aegaea. <u>DECISION NOTICE – Description of permitted development:</u> <i>Variation of Condition 2 of previously approved application DC/24/0367 (Use of land for the stationing of 3 static caravans for residential purposes along with utility buildings, the formation of hardstanding and associated landscaping) to amend site layout, including the siting of day rooms and static caravans.</i> <i>Land Parcel at 520128 116244 Stonepit Lane Henfield West Sussex</i> 3 Pre-Commencement Condition: <i>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.</i> <i>Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).</i> HDC Drainage Object to the proposals outlined in the drainage strategy because the site drainage 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. Summary of concerns: - A site-specific assessment of flood risk has not been made. - Overland flows and exceedance routes have not been considered. - Greenfield runoff rates have not been provided. - Urban Creep allowances have not been considered. - Groundwater level on site has not been considered. - Infiltration rate has been <i>assumed</i> not confirmed. (This must be confirmed at this stage of the planning process). - The drainage hierarchy has been considered briefly. Septic tanks and package treatment plants have not been considered due to site constraints, <i>"including root protection areas, and offsets from buildings and boundaries"</i>... but there is an area within the red line boundary which has not been utilised for use within the drainage	

strategy. This area may provide sufficient space for a septic tank/package treatment plant. The applicant should provide a response to justify their decision to not utilise this space within the red line boundary.



- The cesspools sit along the boundary of the site, immediately below hedgerow planting (which is presumably for screening purposes) as shown on the 'Block Plan' page 16 of the Drainage Strategy Report. Minimum cover level above the cesspools must be provided and consider conflicts between the drainage strategy and proposed planting along the property boundary for screening purposes (if considered a planning requirement). The location of these cesspools may also be undesirable along the property boundary should fencing be proposed, as they may be damaged during installation of fencing, resulting in leak of **untreated** effluent.



- A cesspool is not considered a treatment system, rather a holding tank. As such, HDC Drainage consider the calculations for the capacities of each cesspool to be too low, having referred to '*British flows and loads*' and (presumably) the '*Table of Loadings for Sewage Treatment Systems*' in this document. Building regulations (Document H) specifies that cesspools should be sized 18,000 litres per 2 users, with additional 6,800 litres for each additional user (this would translate to 38,400 litres per dwelling under the assumption each dwelling caters to 5 people, as stated in the drainage report). As shown on the Drainage Strategy Plan, the Terraced Day Room(s) has connections to all three cesspits, which hasn't been accounted for in the

calculations. Connection to all three cesspits also seems somewhat implausible. In addition, the central static caravan has no foul waste connection to a cesspit, which is understood to be an unintentional oversight, as the drainage strategy report states *"Each plot is proposed to be served by its own cesspool."*

- The cesspools are located too close to the buildings. Building regulations recommends a buffer of 7m between residential dwellings and cesspools, with the cesspools to be downslope from these dwellings.
- The cesspools are located within the immediate vicinity of the proposed SuDS (permeable paving). The surface water drainage strategy relies on an infiltration-based SuDS system. As such, the cesspools (or any other foul drainage system) should not immediately abut the permeable paving due to concerns about contamination.
- HDC commends the drainage strategy for considering '*Perforated under drainpipe to distribute flows within permeable paving sub-base*' so that the overflow from the rainwater harvesting units is not concentrated onto a small area of the permeable paving.

To overrule an objection from HDC Drainage, the Drainage Strategy must meet the requirements set out in the Main Comments below.

MAIN COMMENTS:

- 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).
- 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.

- 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.
- 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.
- In addition to Planning Permission, the applicant may additionally require Ordinary Watercourse Consent (OWC) from the Lead Local Flood Authority at West Sussex

County Council, to consent to any works adjacent to or within an ordinary watercourse.

- On the Horsham District Council website, please see information about Surface Water and Drainage Statements: <https://www.horsham.gov.uk/planning/planning-applications/guidance-for-preparing-a-planning-application/surface-water-drainage-statement#requirements>
- 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
- Whilst not a mandatory requirement, HDC Drainage welcome and encourage the consideration of rainwater harvesting within the proposed development.

ANY RECOMMENDED CONDITIONS:

NA

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	10/02/2026