TO:	Horsham District Council – Planning Dept
LOCATION:	The Paddocks Stane Street Five Oaks Billingshurst
DESCRIPTION:	Erection of 1.no two-storey dwelling with and associated landscaping.
REFERENCE:	DC/26/1715
RECOMMENDATION:	Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

The following documents have been reviewed:

- Letter of correspondence from Southern Water to Horsham District Council, Dated: 18th November 2026
- Drainage Design, Dated: January 2025 (October 2026), Author: EAS Ltd

The assessment of the outfall for the management of surface water is insufficient. From the image provided, the existing ditch does not appear to be appropriate - it doesn't appear the ditch has been managed appropriately, the depth of the channel is unknown but appears to be very shallow and the connection to the wider network is unknown. Ownership of the ditch/watercourse has not been discussed. Additionally, the ditch is described as 'to the east' but on the drainage plan, it is shown to the north?

The Drainage calculations are titled 'Surcharges Calcs (Sized at 30 yrs storm)', and the text acknowledges *"The surface water drainage system has been designed for the 30-year return period event plus a 40% allowance for climate change and tested for surcharge for the 1 in 100-year return period event (1% Annual Exceedance Probability) plus a 45% allowance for climate change."* It must be acknowledged that the design event should be for the 1 in 100 year storm event + 45% climate change allowance, where the 1% AEP + climate change storm event is safely contained within the site without risk to persons or property. It is unclear whether the drainage design has accounted for this.

Urban creep has not been accounted for.

It is unknown whether all impermeable areas have been accounted for in the design calculations.

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 35 and Policy 38.

MAIN COMMENTS:

To overrule an objection from HDC Drainage, the applicant must address the comments provided above. For consideration, the information below outlines the level of detail expected within the Drainage Strategy, which HDC Drainage review as part of the application process.

- 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).
- If connections to Southern Water Utilities are proposed as part of the development/ redevelopment, supporting plans and assumed points of connection must be provided as well as expected flow rates. Connection to the public sewerage network is advised, wherever it is reasonable to do so.
- 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 2-year runoff rate (100% AEP) or 3l/s/Ha (whichever is greater) 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 <u>all</u> 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.

- If a ditch and/or watercourse is present on site, 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.
- If a ditch and/or watercourse is present on site, 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.
- If a ditch and/or watercourse is present on site, 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.
- If a ditch and/or watercourse is present on site or along the boundary of the site, the applicant must demonstrate ownership of the ditch/ watercourse.
- If a ditch and/or watercourse is to be the intended outfall location for surface water and/or treated effluent from a Package Treatment Plant (PTP) / Sewage Treatment Plants System, the applicant must obtain permission from the landowner for use of that feature.
- 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. Please be advised, if the infiltration rate is acknowledged to be poor on site (following BRE365 infiltration testing at the location and depth of the proposed devices) Percolation Testing (BS6297) is advised, as this will be a requirement of the Environment Agency should the applicant need to apply for an environmental permit.
- 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, 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, for non-potable use.

ANY RECOMMENDED CONDITIONS:

NA

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	24/11/2026