

From: [REDACTED]
Sent: 13 September 2026 16:42
To: Planning
Subject: Serious access omissions DC/25/2114

Categories: Comments Received

Serious access omissions
DC/25/2114

Dear Mr Holmes

This letter is an addition to a previous letter regarding access to maintain the Swale.

I formally object to the drainage response submitted by the applicant's consultant, Aqua Terra Consulting, specifically regarding their inadequate response to Horsham District Council's request for Maintenance access details.

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=9CB9686AD82042CDB7D30B09B23CA226

Under Comment 7, the Council explicitly mandated that the Maintenance and Management Plans for both the foul and surface water drainage systems '**must include access requirements.**'

Aqua Terra's response—stating only that access to the swale "**will be possible from the north due to the extensive land ownership**"—is a generalised text assertion that I suggest completely fails to satisfy the Council's request or statutory planning guidelines as shown below...

Horsham's **Surface Water Drainage Statement guidance** says:

'We expect as part of any planning application that includes SuDS, an applicant will provide information to demonstrate that suitable adoption and maintenance arrangements are in place.'

It also says that the SuDS solution '**must operate effectively for as long as the development exists**' and that developers must take account of the '**layout of the site when planning and positioning the different SuDS elements.**'

<https://www.horsham.gov.uk/planning/planning-applications/guidance-for-preparing-a-planning-application/surface-water-drainage-statement>

Most importantly, Horsham's **Level 1 Strategic Flood Risk Assessment**, prepared specifically for **Horsham District Council**, states:

'All parts of the drainage system should be designed to be accessible at all timesIt then says:

'It is advisable that a maintenance plan be submitted with the drainage application, including details of access arrangements, the safety of operatives, and the frequency of maintenance.'

https://www.horsham.gov.uk/data/assets/pdf_file/0003/139584/Horsham-Level-1-SFRA_FINAL_Report.pdf

National standards for SuDS

On **Page 39**, under the **"Operation and maintenance"** subsection, clause **7.12** states explicitly: **"7.12 The surface water drainage design shall allow free, safe, and easy access (including easements where required) for all personnel, vehicles and machinery required to undertake maintenance of the drainage features and for emergency response such as a pollution incident. Care should be taken to ensure that the design enables easy access to components which are at greater risk of being subject to pollution or becoming clogged or blocked, such as soakaways, outfalls and trash screens or are critical in extreme events, such as flow controls."**

A hydro brake **flow-control** device controlling the discharge from the site drainage system is clearly mentioned in The Drainage Report



Horsham District Planning Framework

Under Policy 38 (Infrastructure Provision) and the local validation guidelines, a planning application for any development altering site runoff cannot be approved or legally validated without **detailed evidence** of how Sustainable Drainage Systems (SuDS) are maintained. [1]

To satisfy the **Lead Local Flood Authority (LLFA)** and Horsham's planning officers, your **Maintenance and Management Plan** must legally include: [1]

Site Engineering Layouts and Sections: Scaled plans (typically at 1:100 or 1:200) mapping the exact physical layout of the swales, basins, and outfalls, showing that **access paths** from the public highway are completely unobstructed by building platforms, trees, or structural boundaries.

[1]

Department for Environment, Food & Rural Affairs Guidance **National standards for sustainable drainage systems (SuDS)**

Requirement 7.12:

States that the design..... *'shall allow.....safe, and easy access for all personnel, vehicles and machinery required to undertake maintenance.'*

<https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

CIRIA SuDS Manual (C753) Standards:

General Maintenance Access & Corridors (Part E / Chapter 32 & 33)

- **Chapter 32 (Operation and Maintenance) & Chapter 33 (Health and Safety / CDM Regulations):**

These chapters outline the requirements for managing SuDS. They emphasize that **safe and practical access routes (maintenance corridors)** must be integrated into the site layout during the initial design phase to ensure standard maintenance vehicles can safely reach the features without damaging adjacent property or posing a safety hazard.

- https://www.ciria.org/CIRIA/Books/Free_publications/C753F.aspx

Finally

Within the **Government Guidance....Use of Planning Conditions**

<https://www.gov.uk/guidance/use-of-planning-conditions>

Paragraph: 003 Reference ID: 21a-003-20190723B

Page 2 of the guidance it states:

....the objectives of planning are only served when conditions are *'exercised in a way that is clearly seen to be fair, reasonable and practicable.'*

As far as I am aware, there is no viable or realistic physical access route to the site to carry out the full maintenance procedures shown in detail in both The Drainage Strategy and Habitat Management Reports, applying a condition to this effect would fail the test of being "practicable" (workable), leaving the Council with clear grounds to refuse the application outright.

Yours faithfully



Oxcroft
Church Farm Walk

Sent from my iPad