

TO:	Horsham District Council – Planning Dept
LOCATION:	St Johns Farm Trout Lane Brooks Green West Sussex
DESCRIPTION:	Demolition of existing buildings. Erection of 4no dwelling houses with associated parking and landscaping.
REFERENCE:	DC/26/0703
RECOMMENDATION:	Holding Objection - More Information
SUMMARY OF COMMENTS & RECOMMENDATION: The following documents have been reviewed: • Letter of correspondence from Southern Water to Horsham District Council, Dated: 17th June 2026 • Design & Access Statement (Part 1 and 2), Dated: 27 February 2026, Author: STARC Architects • Application Form, Dated: 29/04/2026 • Location Plan, Drawing No: PL_00_001, Dated: March 2026, Author: STARC Architects HDC Drainage require More Information 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. The applicant has provided <u>no</u> information with regards to a Foul or Surface Water Drainage Strategy. The Application Form states that the development intends to dispose of Surface Water via SuDS and a soakaway, but a layout of the proposed strategy has not been provided and no supporting infiltration testing has been submitted to determine whether the implementation of a soakaway within the redline boundary is possible. The Application Form states Foul Sewage is 'unknown' which is unacceptable. Restricted space within the red line boundary and neighbouring Ancient Woodland creates considerable design constraints (as the drainage strategy drainage will not be allowed to encroach within 15m of the woodland edge). Drainage should be considered carefully at this stage of the Planning Application Process, to identify what can be achieved on this site. HDC Drainage do not recommend that Drainage is conditioned for this application. The applicant must provide the information requested in the Main Comments section 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).
- 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 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.
- If restricting runoff rates back to the 1 in 1-year greenfield runoff rate is considered unreasonable, HDC Drainage may allow discharge rates to be restricted to as close as feasibly possible, limiting up to a 50% betterment of the brownfield 1 in 1-year runoff rate as a last resort.
- 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.
- 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.
- 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.

ANY RECOMMENDED CONDITIONS:

NA

NAME:	A.Furness
DEPARTMENT:	Horsham District Council - Drainage
DATE:	24/06/2026