Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Lead Local Flood Authority

Date 06/11/2025

Sam Whitehouse
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Sam

DC/25/1327 Land East of Mousdell Close Rectory Lane Ashington RH20 3GS
Erection of 74 dwellings with associated access, parking, and landscaping.

Thank you for your re-consultation regarding the above application, received on 16th October 2025. We have reviewed the additional submission made by the applicant following my previous comments dated 30th September 2025.

In my previous comments I objected to this planning application due to the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy, with specific regard to the following points:

1. *The Flood Risk Assessment submitted as part of this application is dated 4th August 2025, which was **after** the new "National Standards for Sustainable Drainage Systems (SuDS)" were published by Defra (in June 2025). However, the FRA still refers to the superseded "Non-Statutory Technical Standards for SuDS" and the surface water drainage strategy fails to align with the requirements of the new SuDS standards (which put a much greater emphasis on water re-use, interception, source control, and surface-level open SuDS features and the use of multiple SuDS features in series to improve water quality, site amenity and ecology). We are of the view that meeting the new SuDS standards is likely to require significant changes to be made to the layout. (The necessary changes should reduce the reliance on and large scale of 'end of system' attenuation features, particularly subterranean plastic crate storage).*
2. *The necessary ground investigations required to inform the SuDS design do not appear to have been undertaken (no results appear to have been submitted).*
    a. *BRE 365 percolation testing results are required to definitively determine if on-site infiltration is viable, or not. An off-site discharge of surface water is only acceptable when it has been **proven** that on-site infiltration is unviable.*
    b. *Winter groundwater monitoring results are required to inform the design or soakage and/or attenuation features. (If peak winter groundwater levels are deep enough, attenuation features should be permeably lined to utilise any limited infiltration potential that exists, but if peak groundwater levels are so shallow that they may be above the base of any attenuation features it will be necessary to impermeably line the features to ensure their capacity is not compromised by*

groundwater. In that latter scenario the applicant should also provide details showing that any floatation potential has been appropriately mitigated).

3. *The surface water drainage layout submitted provides insufficient information about the receiving watercourse's: nature, condition, hard bed levels, and connectivity with the wider network of watercourses.*
    a. *On the drainage plans the ditch stops within the red line boundary, is there connectivity with the wider watercourse network beyond the site boundary?*
    b. *The proposed discharge invert level is at the measured ditch bed levels, which is not acceptable unless those bed levels are prior to any de-silting and regrading. If that is the case what will the levels be post maintenance?*
    c. *Is there a culvert immediately downstream of the discharge point, is this to be retained or removed (is it in an appropriate condition and of a suitable capacity to be retained)?*
4. *No construction detail drawings for the SuDS components have been submitted.*
5. *No exceedance flow path plan has been submitted.*

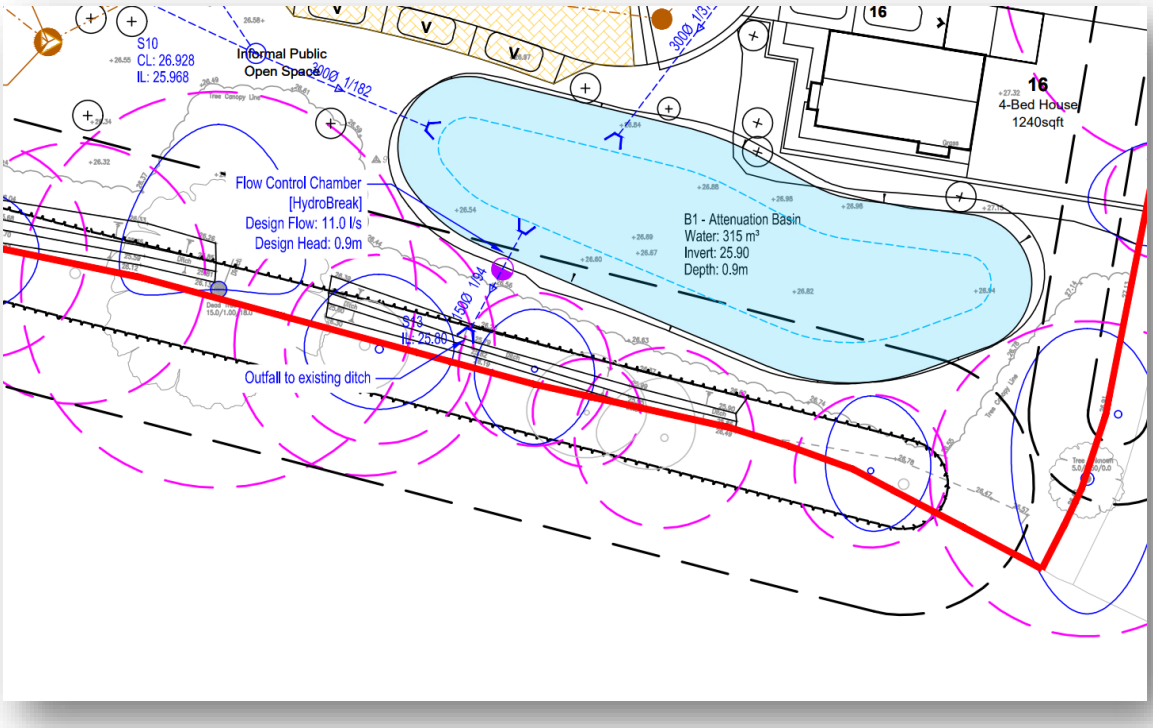
In my previous comments I set out how our objection could be overcome (points "a" to "e" reproduced below). The applicant's drainage consultant has now responded through a Technical Note dated 13/10/2025:

a) *The applicant needs to update their surface water drainage proposals so that they align with the new SuDS standards. Details of the compliance with each of the new standards should be clearly set out in a supporting technical note.* The technical note details the consultant's view that the previously submitted SuDS proposals are aligned with the new "National Standards for Sustainable Drainage Systems (SuDS)." However, the technical note does not clearly set out details of the compliance with each of the new standards, as requested. We remain unconvinced that the previously submitted SuDS proposals fully align with the new standards (which, as previously stated, put a much greater emphasis on water re-use, interception, source control, and surface-level open SuDS features and the use of multiple SuDS features in series to improve water quality, site amenity and ecology). The technical note also discusses the large geocellular tank utilised in the submitted proposals: "*It is noted that geocellular tanks are used in the design, and this is not the LLFA's preference, but the multifactorial technical and geo-environmental constraints of the site means that a large amount of attenuation had to be provided and could not be delivered through surface level SuDS features.*" This raises the question of the nature of the constraints preventing the delivery of surface level SuDS features that would be better aligned with the new standards? Do the current proposals constitute an overdevelopment of the site and therefore is that the primary factor preventing the delivery of more appropriate, open, surface-level SuDS features (that are likely to have larger footprints that some of the drainage features currently proposed).

b) *The results of appropriate ground investigations should be submitted to support the SuDS scheme design.* The applicant has now submitted a geoenvironmental report dated (3rd October 2025) containing ground investigation results that illustrate on-site infiltration is unviable (due to poor infiltration rates). We thank the applicant for providing this evidence as without it we were unable to determine if the drainage strategy was aligned with the drainage hierarchy. However, the report does **not** contain any peak winter groundwater monitoring results (just the results of some limited groundwater monitoring undertaken from July to September). As discussed in my initial comments; the results of winter groundwater monitoring are necessary

to inform the SuDS proposals. If peak winter groundwater levels are deep enough, attenuation features should be permeably lined (or unlined where appropriate), to utilise any limited infiltration potential that exists, but if peak groundwater levels are so shallow that they may be above the base of any attenuation features it will be necessary to impermeably line the features to ensure their capacity is not compromised by groundwater. In that latter scenario the applicant should also provide details showing that any floatation potential has been appropriately mitigated). We feel that the peak winter groundwater monitoring results can be presented at the discharge of conditions stage, should permission be granted.

c) *Further information about the acceptability of the proposed discharge to the receiving watercourse needs to be submitted.* The new technical note states: "*The drainage ditch shown in the topographic survey is not that which is intended for the surface water discharge (hence why we are not addressing the comment that there appears to be a blockage in this ditch). The drainage ditch that is on the topographic survey is a drainage grip dug by the farmer to assist with field drainage. The actual discharge point will be the watercourse that is immediately to the south of the drainage grip on the boundary of the site (and which the landowner has riparian rights to).*" This statement appears to directly contradict the Drainage Strategy Plan (Drawing ref: 2504072-0501 P03) that was re-submitted as appendix K of the technical note. In that drawing the outfall from the proposed SuDS scheme is shown to discharge to a non-contiguous ditch within the site boundary and north of the tree line, which would appear to be the drainage grip mentioned above. (See excerpt below from the drainage strategy plan).



As discussed in my initial comments: The surface water drainage layout plan provides insufficient information about the receiving watercourse's: location, nature, condition, hard bed levels, and connectivity with the wider network of watercourses. To remove our objection, we need to be satisfied that there is a

viable destination for the site's discharge. Therefore, if the above statement from the technical note is correct (thus meaning the drainage strategy plan is erroneous), can the applicant please submit an amended drainage plan, detailing: The proposed discharge invert level, the existing silt levels, and the hard bed levels in the receiving watercourse. Additionally, two images of what I assume is the watercourse in question have been uploaded to the portal (dated 23rd October), these two images also raise concerns about the condition of the watercourse, as it appears to be severely obstructed with silt and debris). Can the applicant therefore please add a note to the amended drainage strategy plan confirming that routine the maintenance (in the form of removal of debris, de-siltation and re-grading) necessary to ensure the receiving watercourse is in a suitable condition to receive the discharge from the site, will be undertaken.

d) *Construction detail drawings for all SuDS features (including sections through any ponds/basins) needs to be submitted.* The technical note puts forward an argument that it is inappropriate to request construction detail drawings at the full application stage of the planning process. However, there is balance that needs to be met, as at the full application stage the applicant and their drainage consultant need to provide sufficient detail to satisfy us, the Lead Local Flood Authority (as the statutory technical consultees regarding surface water drainage), that their proposals will adequately drain the proposed development. We feel the limited detail of the submitted drainage strategy plan does not provide that necessary level of assurance to us. Or particular concern in the attenuation basin shown in the excerpt of the plan above which is located extremely close to one of the 4 bed houses, hence our request for more information about this (and other proposed SuDS features).
e) *An exceedance flow path plan needs to be submitted.* An acceptable exceedance flow plan has been submitted; however, this document may need to be amended if there are subsequent changes made to the proposed layout and drainage strategy.

We will consider reviewing this objection when the remaining outstanding issues highlighted above are adequately addressed and we are formally reconsulted.

Yours sincerely,

Duncan Keir
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

The following documents have been reviewed, which have been submitted to support the application.

- Technical Note TN02 – Response to LLFA Comments on DC/25/1327 (Motion, 13/10/2025)
- Flood Risk Assessment and Drainage Strategy (Motion, 04/08/2025)