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Lead Local Flood Authority

Jason Hawkes
Development Control
Albery House
Springfield Road
Horsham
RH12 2GB

Date 2nd October 2025

Dear Jason,

RE: **DC/25/1312 – Land West of Ifield, Charlwood Road, Ifield, West Sussex**

Thank you for your consultation on the above site, received on 4th September 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

The National Standards for SuDS were updated in July. These need to be followed. We request a technical note or similar explaining how each standard will be met. We appreciate the timing of the release of the updated standards in relation to the work previously carried out, however we require applications to follow up to date policy, guidance and standards. The updated standards are very likely to mean alterations to both the full and outline parts of the application are needed, as this has been the case with other similar applications.

We are supportive of the use of SuDS features, in particular the use of swales, filter strips and rain gardens to drain the primary highway through the site.

We **object and require additional information regarding:**

Technical note to cover how each National SuDS Standard is met/will be met (different levels of detail will be needed for the outline compared to the full).

For the full:

For the Charlwood Road junction, if it is proposed that this would count as 'previously developed site', the updated National Standards for SuDS need to be followed, therefore a relaxation factor of a maximum 5 times greenfield runoff rate shall be used instead. We will also need evidence to show why greenfield runoff cannot be achieved.

Further details on the surface water quality are required, in particular given the primary road through the site will have higher levels of traffic. Standard 4 of the National SuDS Standards provides further detail on what we expect to see.

It is noted that the colour choices (yellow for the manhole labels) are very difficult to read.

For the outline:

To check the sequential approach has been followed for the proposed masterplan, we request the illustrative masterplan/land use parameter plan is overlaid with Risk of flooding from surface water mapping.

While we appreciate the need for off plot/regional storage given the size of the site, managing surface water close to source shall be prioritised, to ensure the National SuDS Standards are followed.

It is noted that there a two surface water pumps proposed in the south of the site, which is not a sustainable method of draining the site.

The catchments need to be more clearly shown on the drainage layout.

For both:

As highlighted in Flood risk assessments: applying for planning permission , surface water flood risk modelling included on the Flood Map for Planning has known limitations which are covered in the FRA, however it is the applicants responsibility to check if the mapping is suitable for the proposed development. While section 4 of the FRA describes some concerns about the EA Surface Water Flood Risk mapping, we do not have enough evidence to adequately assess these points. It is therefore difficult for us to assess whether the pre-existing surface water flood risk will be adequately addressed with the surface water drainage strategy.

In addition, there are historic flood events within the red line boundary which are in our Local Flood Risk Management Strategy which have not been referenced. These surface water flooding events correspond with the area at risk along Rusper Road. There may be

other events that have occurred that have not been reported directly to our team. As fluvial flood risk is not the only type of flood risk within the site, it is important to consider all types of flooding equally, in line with NPPF and PPG Flood risk and coastal change.

As it is not on the Flood Map for Planning, the depths layers in Check your long-term flood risk mapping cannot be used for planning purposes, as it only reflects current depths, not the depths etc for the lifetime of the development. The Environment Agency are supposed to be releasing additional surface water flood risk layers for planning purposes, however the release date remains unclear.

With reference to the section in the FRA which covers uncertainty about the Flood Zones around Rusper Road, we believe further discussion with the EA in this point is required. As LLFA we can support from a surface water perspective if needed. The surface water flood risk along Rusper Road will need to be addressed still.

The surface water drainage features shall not be located in areas identified at risk from flooding in 1% AEP event from rivers/seas and surface water unless designed to be function under flood conditions. Please can the flood risk mapping be overlaid over/under the drainage layout to enable us to check this. The compensation areas should also not be within flow paths, as that then would mean the fluvial compensation areas would be inundated with surface water rather than fluvial water from the River Mole. The EA are also likely to comment on this.

Other comments:
The proposal to connect to the culverted ordinary watercourse under Rusper Road by Greenacre is acceptable in principle, however it will require Ordinary watercourse land drainage consent. Other proposals within the drainage strategy will also require consent – it is recommended to run the consenting process alongside planning process to ensure there are no delays to gaining OWC, which could delay the construction. Please note we have 2 months to determine consent applications.

We couldn't find the ground investigations apart from a small section which referred to them in the FRA. For the outline, this is something we can condition if they have not been completed, as the groundwater levels will be needed for the detailed drainage design.

To clarify, Schedule 3 of the Flood and Water Management Act 2010 has not been enacted yet, therefore WSCC are not a SuDS Approval Body currently.

A SuDS Phasing plan will be required, however this is something we can recommend conditions for once we remove objection.

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

As pre-app has been used, we are happy for the applicant to contact us directly about either part of the application. Please email the officer involved directly, not the shared inbox, copying in the LPA case officer so they are kept in the loop.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
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Annex

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

Environmental Statement Chapter 14: Surface Water Flood Risk by Ramboll, July 2025, Version 1
Flood Risk Assessment by Ramboll, 4th August 2025, Revision 8.0
Drainage Strategy Report by Ramboll, 24th June 2025, Revision P04
Phase 1 Surface Water SuDS & Foul Drainage Design Report by Arcadis, 20th June 2025, Revision P02, Status S2