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**Lead Local Flood Authority**

Sam Whitehouse  
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Date 04/11/2025

Dear Sam

**DC/25/1269: Land North of Guildford Road Bucks Green Rudgwick West Sussex Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.**

Thank you for your re-consultation regarding the above application, received on 21<sup>st</sup> October 2025. We have reviewed the additional submission made by the applicant following my previous comments dated 30<sup>th</sup> 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 May 2025. Since that date new "National Standards for Sustainable Drainage Systems (SuDS)" were published by Defra (in June 2025). Applications currently making their way through the planning process need to align with those new national standards. Unfortunately, the surface water drainage strategy submitted as part of this application fails to align with the requirements of those new SuDS standards (which put a much greater emphasis on water re-use, interception, source control, surface-level open SuDS features, and the use of multiple SuDS features in series to improve water quality, site amenity and ecology). Please be aware that we are of the view that meeting the new SuDS standards is likely to require significant changes to be made to the illustrative layout. Therefore, we recommend the layout is not agreed at this outline stage, if planning permission is granted. (The necessary changes should, however, reduce the reliance on, and the large scale of, 'end of system' attenuation features, particularly subterranean plastic crate storage).*
- 2. Only some of the necessary ground investigations required to inform the SuDS design appear to have been undertaken. BRE 365 percolation testing results have been submitted which prove that on-site infiltration is unviable at this location, but the results of winter groundwater monitoring have not been submitted. These*

results are required to inform the design of 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 submitted drainage strategy is critically reliant on a c.170m long surface water sewer that will need to be constructed under the public highway to enable the site's surface water discharge to be conveyed to a suitable receiving watercourse. It is unclear how the site can be drained without this system (or a similar system that discharges elsewhere). However, concerningly, virtually no information has been provided about the viability of the delivery of such a system.
  - a. Is there an agreement in principle for this discharge with the riparian landowner of the receiving watercourse?
  - b. Are there definitely no clashes with other services buried under the highway that may prevent this system being delivered?
  - c. Have discussions about these proposals been undertaken with WSCC Highways?
  - d. Who will be responsible for the management and maintenance of this system?
  - e. Is the proposal for this structure to be adopted by Southern Water, or for this to be a public surface water sewer requisition from Southern Water?

The answers to the above questions are needed to determine if the proposed development can be appropriately drained.

4. No exceedance flow path plan has been submitted.

In an attempt to overcome our objection, the applicant's drainage consultant has now submitted further information:

- a) A letter has been submitted (dated 20<sup>th</sup> October 2025) that confirms that "For future revisions of the drainage strategy, the design will be developed to ensure full alignment with the new UK National Standards for Sustainable Drainage Systems (SuDS). The updated strategy will aim to manage surface water runoff as close to its source as possible and integrate multiple SuDS features that deliver both hydraulic and environmental benefits." The letter then goes on to offer further detail about how that will be achieved. As this application is still at outline stage, and the amended detailed SuDS design (and proposed layout) can be approved at the reserved matters stage, I feel that my first objection has been overcome.
- b) The aforementioned letter also confirms that appropriate ground investigations will be undertaken, and the results will be submitted at the reserved matters stage (and used to inform the revised drainage strategy).
- c) An exceedance flow path plan has also been submitted. However, I have a concern that this flow path plan illustrates that the existing layout/drainage strategy does result in some exceedance flow heading in the direction of existing houses. However, this concern can and must be resolved when the new proposed layout and surface water drainage scheme design are submitted at the reserved matters stage. Some consideration has also been given to the management of potential diffuse run-off from the large expanse of up-gradient open land to the north of the

red line boundary. Again, the full details of these measures could be agreed at the reserved matters stage.

d) The latest submitted “Preliminary Drainage Strategy” plans also now include a note stating that the proposed off-site drainage is “subject to section 104 agreement” (under the Water Industry Act) confirming that this surface water sewer will be constructed to the standards required to become a public sewer, where the local water company will become responsible for its future maintenance. This allays the concerns I had about this particular aspect of the drainage scheme.

Considering the newly submitted information I now feel able to lift my previous objection to this application.

I would now like to request the following conditions be applied:

Prior to, or in conjunction with, the submission of each Reserved Matters application for the development hereby permitted, details of a scheme for the disposing of surface water by a means of sustainable drainage system shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall then be implemented in full in accordance with the approved details prior to first use of the development. The submitted details shall:

- Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharge from the site via a proposed Sustainable drainage system and the measures taken to prevent pollution of the receiving surface waters.
- Demonstrates that the proposed surface water drainage system does not surcharge in the 1 in 1 critical storm duration, flood in the 1 in 30 plus climate change critical storm duration or the 1 in 100 critical storm duration,
- Demonstrates that any flooding that occurs when taking into account climate change for the 1 in 100 critical storm event in accordance with NPPF does not leave the site uncontrolled via overland flow routes.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF.

The development hereby approved shall not be first occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- a timetable for its implementation,
- details of SuDS features and connecting drainage structures and maintenance requirement for each aspect,
- a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF.

Yours sincerely

Duncan Keir  
**Flood Risk Management Team**  
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## Annex

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

- Paul Basham Associates Letter (Ref: 145.5008/20102025/FRA) Dated 20/10/2025.
- Exceedance and Overland Flow Plan: (Ref: 145.5008.0510 Rev P01) Dated (10/2025)
- Preliminary Drainage Strategy Sheets 1 and 2 (Ref: 145.5008.0504 Rev P02)
- Flood Risk Assessment and Drainage Strategy (Paul Basham Associates Rev 2 10/06/2025)