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Lead Local Flood Authority

Sam Whitehouse
Horsham District Council
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Springfield Road
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RH12 2GB

Date 17/12/2025

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 the 3rd of December 2025. I have reviewed the additional submissions specifically the further technical note "[TN03 – Response to LLFA Letter of 6th November 2025](#)" (dated the 25th of November 2025) made by the applicant following my previous comments.

I would like to make the following comments regarding that technical note (TN03):

In response to my first objection, alignment with the National SuDS standards, TN03 states: "[2.2 We acknowledge the publication of the new National Standards for Sustainable Drainage Systems \(SuDS\) \(Defra, June 2025\) and recognise the need for drainage strategies to evolve in response. However, as previously outlined in our technical note, drainage is only one of several statutory and regulatory requirements that influence the form and layout of a development. The planning system requires these often-competing considerations to be balanced in a pragmatic and deliverable manner.](#) 2.3 [In this case, WSCC as the LLFA has advised that the layout should be fundamentally redesigned to accommodate significantly more surface-level SuDS features, potentially at the expense of developable land. Whilst we understand the LLFA's aspiration for an exemplar SuDS scheme, this must be weighed against other mandatory requirements that apply equally to the development and form part of the statutory planning framework.](#) 2.4 [We explored incorporating rainwater gardens within the site layout; however, the only viable locations conflicted with service corridors. Following consultation, we were advised that these features and services cannot occupy the same space. Additional areas were assessed for rainwater gardens, but the remaining suitable locations were within private curtilages, where centrally coordinated maintenance could not be guaranteed, and the rainwater gardens could not be adequately protected.](#)"

The role of the LLFA in the planning process is to offer specialist technical advice to you as the planning officer regarding the acceptability of the submitted surface water drainage scheme when considered against current local and national policies and guidance. The applicant's drainage consultant is correct to state that drainage is only one of several

statutory and regulatory requirements that influence the form and layout of a development, and that the planning system requires these often-competing considerations to be balanced in a pragmatic and deliverable manner. However, we are only consultees with regard to the surface water drainage proposals and are not experts in any of the other competing statutory and regulatory requirements that influence the form and layout of a development nor the relative weighting that should be applied to those competing requirements. Therefore, it would be inappropriate for us to offer any opinion about whether a sub-optimal SuDS scheme should, or should not, be deemed acceptable for this development due to competing requirements. However, it is absolutely our role to highlight our view (through this objection, which we maintain) that the submitted surface water drainage proposals would be better aligned with the current "[National standards for sustainable drainage systems](#)" (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) if the proposals included more source control and open, surface level, SuDS features. We also feel it is our role to question why the submitted scheme does not include more such features. It is clear from the position set out in TN03 that the submitted SuDS proposals are a result of competing constraints, and therefore it is for you as the planning officer to consider acceptability of the proposed SuDS scheme (we feel is not wholly aligned with the required standards) given those competing constraints.

TN03 also offers a response to my 2nd objection that "*the results of appropriate ground investigations should be submitted to support the SuDS scheme design.*" However, in my previous comments I already confirmed that the applicant had subsequently submitted a geoenvironmental report dated (3rd October 2025) containing ground investigation results that illustrated that on-site infiltration is unviable (due to poor infiltration rates). I then confirmed that I was satisfied that peak winter groundwater monitoring results could therefore be presented at the discharge of conditions stage, should permission be granted. So, this point is not in dispute.

With regard to my objection 3(a) relating to the inconsistency between submitted documents regarding the SuDS outfall location, TN03 states: "*WSCC as the LLFA are correct on this matter and the incorrect outfall was shown on the plan. This has been corrected, and the outfall is now to the full drainage ditch.*" This is noted and accepted.

With regards to my objection 3(b) which was as follows: "*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... " "...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.*"

TN03 states: "*2.23 ...we note that the images do not indicate a severe blockage, nor do they suggest that silt and debris present a significant issue.*

I have attached the two images in question to the end of this document as evidence in support of my view. The first image shows what appears to be the root mass of a fallen tree on the left and the ditch in the immediate foreground appears to be completely blocked with silt/mud (perhaps earth displaced by the fallen tree?), and there is only stagnant, still, water visible. The second image also illustrates a watercourse that appears to be obstructed by a significant amount of silt and organic debris. Assuming the two images in question are of the proposed receiving watercourse, I remain of the view that silt and debris **do** present a significant issue. Although this is an issue that would clearly not be insurmountable, hence my request that the applicant to add a note to the amended drainage strategy plan confirming that any routine 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. I therefore reiterate that request.

2.24 We acknowledge that concerns may arise on sites where downstream connectivity is uncertain; however, in this case, the downstream network is clearly defined, mapped, and photographed. On that basis, we do not consider this to be a valid reason for concern.

2.25 For further context, we refer to planning application DC/22/0372, located immediately upstream of the proposed development. In that application, discharge to the same watercourse was accepted by the LLFA. Therefore, questioning the suitability of this watercourse as an outfall in the current application would appear inconsistent with previous decisions.”

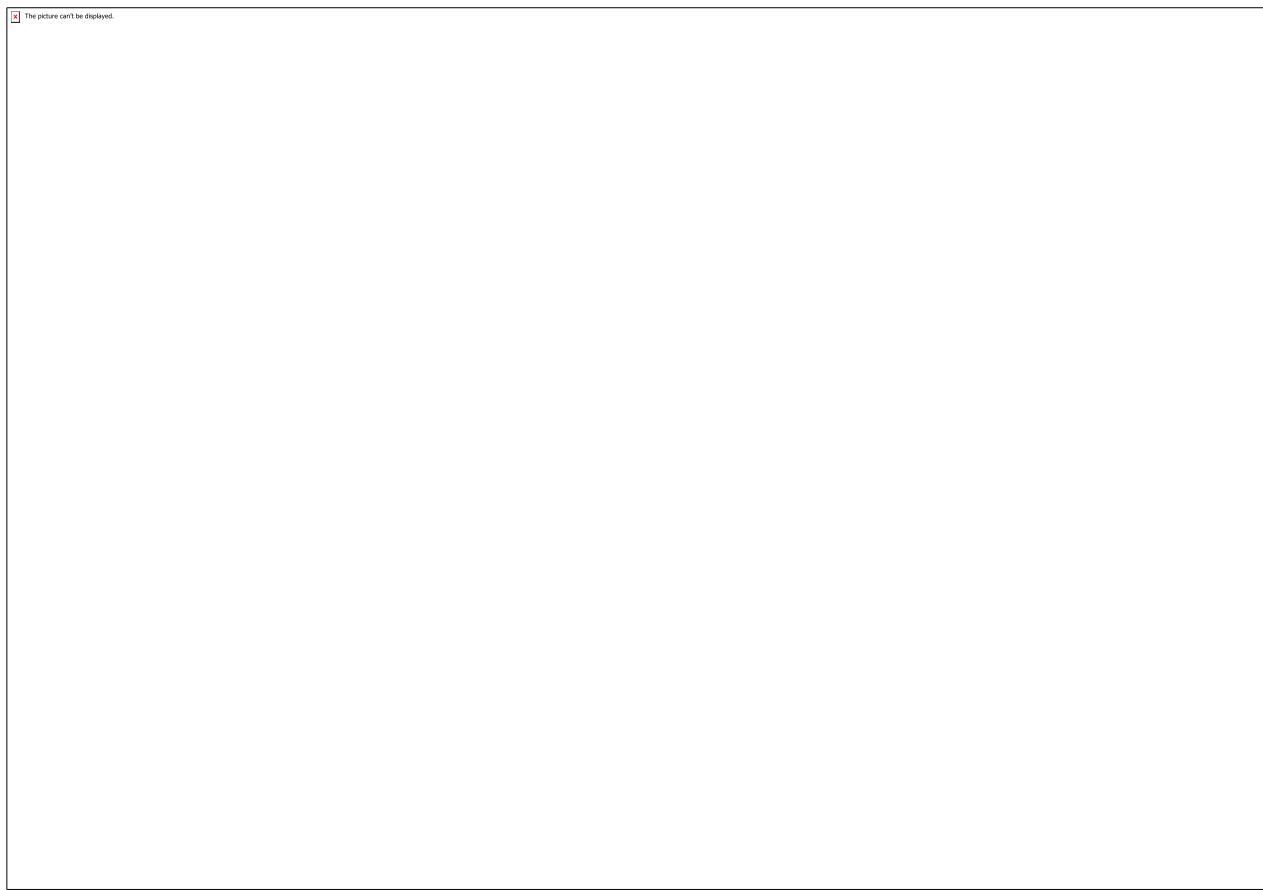
This is not a valid argument as the condition of the receiving watercourse may have deteriorated significantly since the aforementioned application was making its way through the planning process. We remain of the opinion that to enable us to be satisfied that there is a viable destination for the site's discharge, further information is required. (The receiving watercourse does not even appear on the currently submitted drainage plan). Therefore, I would like to reiterate my earlier request for an updated drainage plan detailing the proposed discharge invert level, the existing silt levels, and the hard bed levels in the receiving watercourse, as the viability of the SuDS scheme is wholly reliant on there being a suitable discharge location.

With regards to my Objection 4, which was as follows: “*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, 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. Of particular concern in the attenuation basin, 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).*”

TN03 states: “*2.26 The information submitted to date is comprehensive and provides full details of the drainage system, including its components, levels, gradients, and capacity. This level of detail is sufficient to robustly demonstrate the suitability and effectiveness of the proposed drainage strategy. 2.27 To clarify, the level of information required for planning - whether outline or full - is distinct from what would constitute a construction issue drawing pack, as all site design aspects must be developed to construction detail in*

parallel. Our intention was to discuss this with WSCC as the LLFA and to invite participation in a design team meeting to provide insight into the design process. Unfortunately, this offer was declined, which limited the opportunity for collaborative engagement.”

We maintain this objection as we disagree that sufficient detail regarding the proposed SuDS features has been submitted, with the design of the SuDS basin being a particular concern. For example, the excerpt below shows that whilst some edges of the proposed basin has sloped edges (to the northeast) other sides do not. We need to be assured that the basin will have appropriate bank angles for safety/stability considerations and would like clarification that a basin, with appropriate bank angles, that holds the required volume, can be sited in this location, with an appropriate buffer around it to facilitate its maintenance.



Finally, TN03 also states: “*2.12 We fully support continued dialogue with the LLFA. However, as recorded in the email of 14 November, WSCC indicated they were unwilling to engage during the live application because we had not taken the opportunity for pre-application discussions had taken place - despite the fact that material policy changes have arisen between the time when pre-application discussions would have taken place and the submission of the FRA. Continued engagement is essential in the public interest to ensure compliance with the new SuDS Standards is proportionate, achievable, and balanced against other statutory requirements.*”

Unfortunately, point 2.12 misrepresents our position. The email referred to confirmed that we **were** still willing to engage with applicants and their drainage consultants regardless of whether they had participated in our pre-application advice service or not, but it clarified

that further engagement must be within appropriate boundaries. It stated: “*...if you have any succinct and narrowly focused technical questions, or specific points that you feel require clarification relating to our consultation responses, then feel free to email us those questions and we will attempt to answer them. However, we do not feel it is appropriate for us to be involved in higher level round-table discussions about possible SuDS designs at this (late) stage of the planning process*” (the full application stage).

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

Yours sincerely,

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Flood Risk Management Team
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Annex

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

- Technical Note TN03 – Response to LLFA Letter of 6th November 2025 (Motion, 25/11/2025)

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