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West Sussex
PO19 1RH



Lead Local Flood Authority

Date 30/01/2026

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 the 12th of January 2026. I have reviewed the additional submissions specifically the further technical note "[TN04 – LLFA Comment Response dated the 9th of January 2026](#)" made by the applicant following my previous comments (dated the 17th of December 2025).

I would like to make the following comments regarding the various points discussed in the technical note (TN04):

Point 1 (section 2.1), the alignment of the submitted SuDS proposals with the National SuDS standards: Both the applicant's consultant, and we here at the LLFA, have made our positions clear about this matter, I refer you to the comments I made in my previous submission dated the 17th of December 2025.

Point 2 (section 2.2) Winter groundwater monitoring: I am pleased to hear that winter groundwater monitoring is currently being undertaken. The results of that monitoring should be used to inform the detailed design of the proposed SuDS features. It is not in dispute that the ground conditions on site render infiltration, as the sole means of surface water disposal, unviable. However, wherever peak groundwater levels allow*, attenuation features should remain unlined to utilise any infiltration potential that does exist, to minimise the volume of off-site discharge and help deliver interception. *(Attenuation features should only be impermeably lined when monitoring shows peak groundwater to be within 1m of the invert of the attenuation feature).

Point 3 (sections 2.3 through 2.16) Destination of the discharge from the on-site SuDS: I agree fully with points 2.3 through 2.9. However, I suspect points 2.10 through 2.12 highlight that the consultant has misunderstood the nature of the concerns about the

destination of the SuDS discharge that I have previously raised. Therefore, I hope the following clarifies the situation:

The applicant needs to demonstrate, to our satisfaction, that there is an appropriate destination for the discharge from their proposed on-site SuDS:

- a) The current drainage layout only shows an outfall and not the receiving watercourse. An invert level for that outfall is given (25.80), but no existing silt levels, hard-bed levels, or bank-top levels are provided for the receiving watercourse, so it is unclear if this is a viable point of discharge. As I have previously stated the viability of the SuDS scheme is wholly reliant on there being a suitable discharge location. Therefore, I would like to repeat my request for both the path and levels of the receiving watercourse to be detailed on the drainage layout (to enable me to appraise the suitability/viability of the discharge point).
- b) I also need to understand the condition of the section of the receiving watercourse where the developer/landowner has riparian responsibilities (particularly downstream of the proposed SuDS outfall). This is to ensure the discharge can be appropriately conveyed on downstream (rather than escaping the confines of the watercourse, due to blockages, and causing flooding on third party land). This is of particular concern given the photographs, submitted by others, which suggest that this watercourse may be significantly obstructed. (Note: At no point have I suggested that the developer is required to undertake works to clear sections of this watercourse beyond their riparian responsibilities. I assume the images in question relate to the section of this watercourse under the developer/landowner's control, if they do not; then developer would not be required remediate those problems. Had the current silt levels, hard-bed levels, and bank levels of the receiving watercourse, where it abuts the site, been included on the proposed drainage layout the current situation, and any need for maintenance interventions, would have been much clearer).
- c) I have previously requested that a note be added to the drainage layout 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. No such note has been added; therefore, I still have concerns that the discharge from the development's SuDS could increase flood risk elsewhere, if it is able to escape the confines of the receiving watercourse. (Again, for clarity, this would only apply to the sections of watercourse where the developer/landowner has riparian responsibilities).

Point 4 (SuDS Basin Design): I note and welcome the clarification in point 2.14, and the sections through the proposed SuDS basin that were appended to TN04. The fact that the previous ambiguity existed highlights the importance of such sections being submitted to enable us to clearly understand and interpret the applicant's proposals.

I maintain my objection to this application for the following reasons:

1. I remain unconvinced that the proposed SuDS scheme aligns as closely with the national SuDS standards as it should. I refer you to the comments I made in my previous submission dated the 17th of December 2025.
2. It remains the case that insufficient information has been provided to demonstrate that the proposed destination for the SuDS discharge is appropriate and viable.

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

Yours sincerely

Duncan Keir
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Annex

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

- Technical Note TN04 – LLFA Comments Response (Motion, 09/01/2026).