

Sent:
To:
Subject:
Attachments:

12 December 2025 21:17
Planning; Matthew.Porter

Local Flooding Evidence, and Formal Request to Log Representations – DC/24/1581
Billingshurst Flooding 08-12-25.pdf

Categories: Comments Received

Dear Sir/Madam,

I am writing to formally raise concerns regarding the procedural handling of planning application DC/24/1581, and to explain why this issue is of particular importance to me as a local resident, specifically in relation to surface water and flooding.

Residents were notified of the revised position on water neutrality and the associated technical documents on 23 November 2025 at approximately 1:52pm, with the Planning Committee meeting held on 2 December 2025. Given the technical complexity and significance of these changes, this provided only a very limited number of working days to review the information and submit informed comments. I consider this to be an unreasonably short notice period for consultation on a material change.

I also submitted my own comments on the application on 30 November 2025 at 1:35pm, prior to the committee meeting. However, these comments were not published on the public planning file until after the committee meeting had taken place. As a result, it appears that my representations were not available to Planning Committee members at the time of their decision and therefore could not have been considered.

I wish to reiterate my concern regarding the reliance on claimed water neutrality savings that have not yet been realised or secured. The revised position relies on anticipated reductions in abstraction and leakage savings by Southern Water, rather than mitigation that is already in place and demonstrably effective.

At the time the decision was made, the abstraction licence reduction had not been formally implemented, and the council's own assessment acknowledges that the full details of the wider mitigation package have not yet been provided. As such, the conclusion that the development will be water neutral is based on assumptions about future performance, rather than confirmed, enforceable measures.

In an area already experiencing serious water stress, including Billingshurst, reliance on unrealised or future savings introduces uncertainty and risk. If those savings are delayed, reduced, or fail to perform as anticipated, the additional demand from this development will directly exacerbate existing pressure on local water systems.

This concern is particularly relevant when considered alongside existing surface water capacity issues locally. Water neutrality should be based on mitigation that is certain, secured, and operational at the time of approval, not on savings that are expected to occur at some point in the future

I would like to make clear that my involvement is not driven by opposition to development in principle. I recognise the need for housing. My concern relates specifically to the cumulative impacts of recent development on water management in this area, particularly Surface water along Natts Lane and Merringdean Road, where flooding events have become increasingly frequent.

During periods of moderate to heavy rainfall, local drainage systems are already exceeding capacity, leading to repeated surface water flooding of the highway and adjacent land. There is currently a lack of clear ownership

or accountability for resolving these issues, despite their frequency and impact. These matters were raised in my original comments because they are material to flood risk and infrastructure capacity.

I am particularly concerned that the development assumes surface water flows can be maintained at existing discharge rates. Given the current conditions on the ground, maintaining flows at existing rates will not prevent harm. In practice, flows will either need to be reduced through additional attenuation, or off-site capacity increased by the relevant water authority. If the drainage calculations or assumptions are incorrect, the situation will inevitably worsen.

It is also important to recognise that surface water modelling is inherently assumption-based and relies on historic datasets. Given the well-documented changes in UK rainfall intensity, the lag in trend data, and the increasing frequency of exceedance events, there is a real risk that drainage designs based on outdated assumptions will fail in operation.

To illustrate these concerns, I have attached photographs taken on 09/12/2025 following moderate to heavy rainfall, which show local drainage and surface water systems operating beyond capacity. This evidence is directly relevant to the discharge of pre-commencement and pre-occupation drainage conditions, including those relating to surface water design, construction-phase management, long-term SuDS maintenance, and verification of as-built performance.

Given the above, I am concerned that both the short consultation period on material changes and the non-availability of my submitted comments to members prior to the meeting undermined the ability of the Planning Committee to fully understand the real, on-the-ground implications of this development.

I would therefore be grateful if you could confirm:

- Whether my comments submitted on 30 November 2025 at 1:35pm were circulated to Planning Committee members prior to the meeting;
- Why those comments were not published on the public planning file until after the meeting; and
- How the Council considers that a fair and reasonable opportunity for public participation was achieved given the issues outlined above.
- The attached photographs and this correspondence are recorded as material evidence; and
- This information is taken into account by officers when assessing the discharge of all drainage-related pre-commencement and pre-occupation conditions associated with this permission.

I would appreciate a written response please.

Yours Faithfully

[Redacted]

Photos Taken 08/12/2025



Figure 1 - Water Flowing from Manhole cover on pathway adjacent to Marrinddean road (Facing South)



Figure 2- Merringdean Road - Facing North towards Lower Station Road

Manhole cover overflowing and running down pathway onto the road/junction



Figure 3 - Marrin Dean Road - Facing South Towards Wood Croft

Highway drainage ditch at high level



Figure 4 - Drain on Merringdean Road



Figure 5 - Water flowing from Daux wood entrance



Figure 6 - Waterway at Lower Station road Playground

Water level flowing above timber bank support and erosion protection



Figure 7 - Natts Lane facing west



Figure 8 - Natts Lane facing west

Roadway flooded high water flow running from South to North across the road and through entrance to Lower Station road fields



Figure 9 - Natts Lane - Southern Ditch



Figure 10 - Natts Lane - Flow from Southern Ditch to Lower station road water way



Figure 11 - Natts Lane - Station Road Playing Field Entrance



Figure 12 - Natts Lane Entrance to Lower Station Road Playing Field



Figure 13 - Water flowing from entrance to Station Road Waterway

Videos are also available, these show the true scale of the problem as the still photos don't show the rate of flow.

<https://youtube.com/shorts/mWzrPHDkSek?feature=share>

<https://youtube.com/shorts/hDNuxXbxndo?feature=share>

<https://youtube.com/shorts/J6LueHokcFw?feature=share>

<https://youtube.com/shorts/0QVXOenx-gQ?feature=share>

<https://youtube.com/shorts/x6mBNnS6Xu8?feature=share>