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Lead Local Flood Authority

Date 30/09/2025

Ms Nicola Pettifer
Local Planning Authority Name
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Nicola

DC/25/1327 Land East of Mousdell Close Rectory Lane Ashington RH20 3GS

Thank you for your consultation on the above site, received on 2nd September 2025. We have reviewed the application as submitted and wish to make the following comments.

Erection of 74 dwellings with associated access, parking, and landscaping.

We **object** to this planning application in 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 4th August 2025, which was **after** the new "*National Standards for Sustainable Drainage Systems (SuDS)*" were published by Defra (in June 2025). However, the FRA still refers to the superseded "*Non-Statutory Technical Standards for SuDS*" and the surface water drainage strategy fails to align with the requirements of the new SuDS standards (which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). We are of the view that meeting the new SuDS standards is likely to require significant changes to be made to the layout. (The necessary changes should reduce the reliance on and large scale of 'end of system' attenuation features, particularly subterranean plastic crate storage).
2. The necessary ground investigations required to inform the SuDS design do not appear to have been undertaken (no results appear to have been submitted).
    a. BRE 365 percolation testing results are required to definitively determine if on-site infiltration is viable, or not. An off-site discharge of surface water is only acceptable when it has been **proven** that on-site infiltration is unviable.
    b. Winter groundwater monitoring results are required to inform the design or soakage and/or 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 surface water drainage layout submitted provides insufficient information about the receiving watercourse's: nature, condition, hard bed levels, and connectivity with the wider network of watercourses.
    a. On the drainage plans the ditch stops within the red line boundary, is there connectivity with the wider watercourse network beyond the site boundary?
    b. The proposed discharge invert level is at the measured ditch bed levels, that is not acceptable unless those bed levels are prior to any de-silting and regrading. If that is the case what will the levels be post maintenance?
    c. Is there a culvert immediately downstream of the discharge point, is this to be retained or removed (is it in an appropriate condition and of a suitable capacity to be retained)?
4. No construction detail drawings for the SuDS components have been submitted.
5. No exceedance flow path plan has been submitted.

To overcome our objection:

a) The applicant needs to update their surface water drainage proposals so that they align with the new SuDS standards. Details of the compliance with each of the new standards should be clearly set out in a supporting technical note.
b) The results of appropriate ground investigations should be submitted to support the SuDS scheme design.
c) Further information about the acceptability of the proposed discharge to the receiving watercourse needs to be submitted.
d) Construction detail drawings for all SuDS features (including sections through any ponds/basins) needs to be submitted.
e) An exceedance flow path plan needs to be submitted.

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

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.

- Flood Risk Assessment and Drainage Strategy (Motion, 04/08/2025)