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Lead Local Flood Authority

Ms Nicola Pettifer
Local Planning Authority Name
Horsham District Council
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Date 30/09/2025

Dear Nicola

DC/25/1269: Land North of Guildford Road Bucks Green Rudgwick West Sussex

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.

Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.

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 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.

To overcome our objection:

- a) At this outline stage, the applicant could provide an addendum to the drainage strategy that clearly details how a future revision of their drainage strategy will align with each of the new SuDS standards. As this application is still at outline stage, and the amended detailed SuDS design (and proposed layout) could then be approved at the reserved matters stage.
- b) The results of appropriate ground investigations should be submitted to support the SuDS scheme design. (These could be submitted at the reserved matters stage).
- c) An exceedance flow path plan needs to be submitted which includes consideration of diffuse run-off from the large expanse of up-gradient open land to the north of the red line boundary. (We suspect that run-off generated by the land up-gradient of the proposed development may need some form of positive management/control).

We will consider reviewing this objection when the 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:

- Flood Risk Assessment and Drainage Strategy (Paul Basham Associates Rev 2 10/06/2025)