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West Sussex
PO19 1RH



Lead Local Flood Authority

Date 9th October 2024

Matthew Porter
Development Control
Horsham District Council
Parkside
Chart Way
Horsham
RH14 1RL

Dear Matthew,

RE: DC/24/1158 – Berkeley Homes Development Site Phase 4 and 5, Worthing Road, Southwater, West Sussex

Thank you for your consultation on the above site, received on 3rd September 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a Minor Material Amendment (Section 73) to vary condition 2 of application reference DC/24/0772 (non-material amendment to previously approved application DC/18/1246) to The development hereby approved comprises 199 no. residential dwellings including 61 affordable dwellings and vary the plans approved under condition 1 of application reference DC/18/1246.

As the current layout is significantly different from the previous permission DC/18/1246 the layout is being reviewed fresh rather than comparing differences between plans.

We **maintain our objection** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) relating to:

- The application is not in accordance with the NPPF, PPG Flood Risk and Coastal Change or Policy 38 in Horsham District Planning Framework.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues highlighted below are adequately addressed:

1. An updated drainage strategy for Phase 5 is required as this has not been provided. It must be demonstrated each phase (4 and 5) can standalone if future phases are not built as planned.
2. A Cv value of 1 for summer and winter is required in calculations.
3. For the basin, cross sections are required to ensure suitable side slopes and depths are being used. 2m is very deep for a basin, as an authority we suggest 1m for safety, amenity and biodiversity reasons but we appreciate this may be difficult to achieve for this site. Additionally the basin is in a flow path which will reduce its' capacity in storm events. The cross sections must clearly show areas proposed to always be wet compared to areas proposed to be dry except for storm events.
4. The proposed discharge rate means in the 2-year rainfall event the site will be discharging at the 100 year greenfield runoff rate which increases flood risk elsewhere. Rates should be restricted to Qbar in accordance with SuDS Non-Statutory Technical Standards and NPPF.
5. An exceedance plan showing depth, area and direction of flooding in 1 in 100 + climate change allowance event is required.
6. It is disappointing to see the permeable paving proposed previously is now not included in the most recent plans. The use of source control SuDS is encouraged, such as tree pits, bioretention areas/rain gardens, swales and permeable paving.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

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

- Flood Risk Assessment for Phase 4, 28.06.2024, revision 4.0