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Lead Local Flood Authority

Sam Whitehouse
Development Control
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Date 16th September 2026

Dear Sam,

RE: DC/26/0909 – Land North of Horsham Horsham West Sussex (Mowbray)

Thank you for your consultation of the above application, received on 26th August 2026. We have reviewed the submitted documentation and wish to make the following comments.

This is a reserved matters application for internal access, appearance, landscaping, layout and scale, pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for Phase 1 RM Area 4 comprising 82 (C3 Use) residential units, car and cycle parking, new landscaping, drainage, access and internal roads and associated infrastructure.

Following a review of the documents referenced in the Annex, insufficient information has been provided, and the application is not in accordance with policy. We currently **object** to the application and require the following additional information:

The proposed drainage strategy is not in accordance with the requirements of the new NPPF or the National Standards for SuDS. Whilst the outline permission established the drainage principles, including the discharge rates and attenuation volumes, the layout, scale and appearance of the development were not fixed at that stage and are being determined through this reserved matters application. As such, we would expect the detailed drainage design to demonstrate compliance with the National Standards for SuDS. We consider that there are opportunities to enhance the drainage strategy through the incorporation of additional source control SuDS features, such as rain gardens, bioretention areas, permeable paving and swales, which would assist the development in achieving compliance with the Standards. We recommend referring to our [Sustainable Drainage Systems](#) guidance, which includes a link to the national SuDS template designed to assist applicants in demonstrating compliance with the National Standards for SuDS.

For avoidance of doubt, the LASOO guidance referenced in 3.1 is superseded, as the National Standards for SuDS have updated.

Standard 1 (Runoff Destinations):

There is no evidence that rainwater harvesting has been considered for this parcel. As West Sussex is seriously water stressed, and we believe that there would be a need for landscape irrigation, we would expect rainwater harvesting to form part of the drainage strategy.

Standard 2 (Management of everyday rainfall (interception)):

There is insufficient evidence to demonstrate that the first 5mm of rainfall for the majority of events is managed. As no source control SuDS have been used in the layout, we do not believe that Standard 2 is met.

Incorporating rainwater harvesting designed to the relevant British Standard would assist with this. As infiltration is not viable for this parcel, it is likely that interception methods will need to be used. This includes features such as rain gardens/bioretention areas, permeable surfaces, detention basins and swales.

We would suggest submitting a contributing areas plan alongside any relevant calculations/tables. For avoidance of doubt, the basin will also count as contributing area.

The results from the site investigation shall be considered when designing these features.

Standard 3 (Management of extreme rainfall and flooding):

Further evidence is required to demonstrate there is suitable freeboard between the maximum water level in the 100 year plus 45% climate change allowance and the finished floor levels of the dwellings. This will ensure that the dwellings have are suitably protected from surface water flooding.

An exceedance plan for the 1 in 100 year plus 45% climate change event is required. This shall show the location, area and depth of any flooding, no flooding of property or critical infrastructure and that safe access/egress is retained. Including additional source control SuDS features may assist with this.

To ensure the surcharged outfall modelled by Glanville is appropriately reflected at the reserved matters stage for the basin/spinal road, we request that the same surcharge level is adopted within the Causeway Flow calculations submitted as part of this application.

Standard 4 (Water quality):

We require evidence that a suitable SuDS Management Train has been used. We recommend using the Ciria Simple Index Approach.

Standard 5 (Amenity) & Standard 6 (Biodiversity):

The LLFA would expect the LPA to consult other consultees with specialisms in these areas.

Standard 7 (Design of drainage for construction, operation, maintenance, decommissioning and structural integrity):

There are some discrepancies for the maintenance and management. In the Glanville Report it states that the basin would remain private and be maintained by a management company, however Ardent have stated that the basin would be adopted by Southern Water using a S104 agreement.

The current maintenance and management plan does not correspond with the SuDS Manual. We suggest using the checklist in the SuDS Manual.

The construction section does not comply with the SuDS Manual or National Standards for SuDS.

General comments:

It appears that there may be dwellings located within an area of surface water flood risk. This does not follow the sequential approach.

The topographical survey in Appendix B is unreadable.

It is noted that the hydraulic calculations sheet dates do not correspond with the date on the drainage layout. We have assumed that any alterations to the layout have been considered from an impermeable areas perspective.

As there is an ordinary watercourse on the eastern boundary of the site, we request that a 3m easement from the top of bank is added for riparian maintenance.

Yours sincerely

Eleanor Read
Flood Risk Management Team
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Annex

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

- DRAINAGE TECHNICAL NOTE: 2500120_A-ACE-XX-XX-RP-C-0301, REV B
- PROPOSED DRAINAGE STRATEGY: 2500120_A-ACE-XX-XX-DR-C-0601, REV B