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Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Matthew Porter
Development Control
Albery House
Springfield Road
Horsham
RH12 2GB

Date 2nd April 2026

Dear Matthew,

RE: DC/26/0366 – Land North West of Southwater

Thank you for your consultation on the above site. We have reviewed the application as submitted and wish to make the following comments.

This is an outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.

WSCC Lead Local Flood Authority have provided pre-application advice for this application. Details of the discussions are included within the Flood Risk Assessment and Drainage Strategy.

The applicant has stated that the surface water drainage is split into two catchments, with staged discharge rates for each catchment.

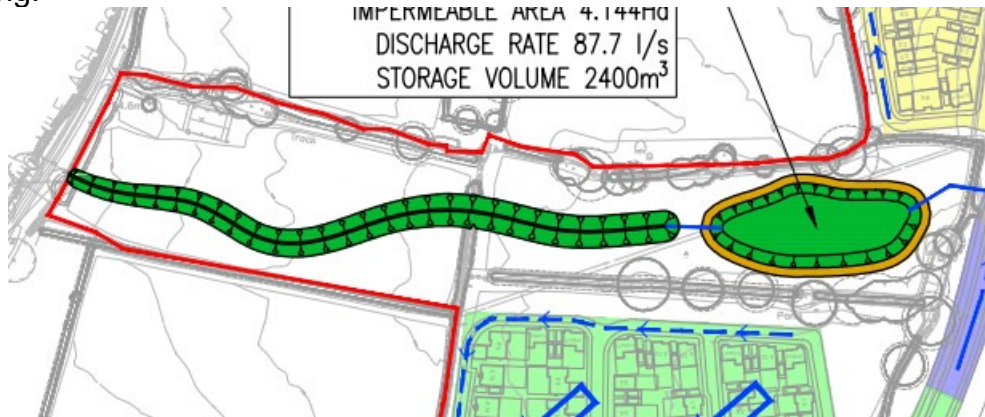
We currently do not have enough information to demonstrate the site can be sustainably drained without increasing flood risk elsewhere. We **require additional information regarding:**

SuDS hierarchy:

While the proforma says in Section 7 that infiltration tests have been completed, these have not been provided.

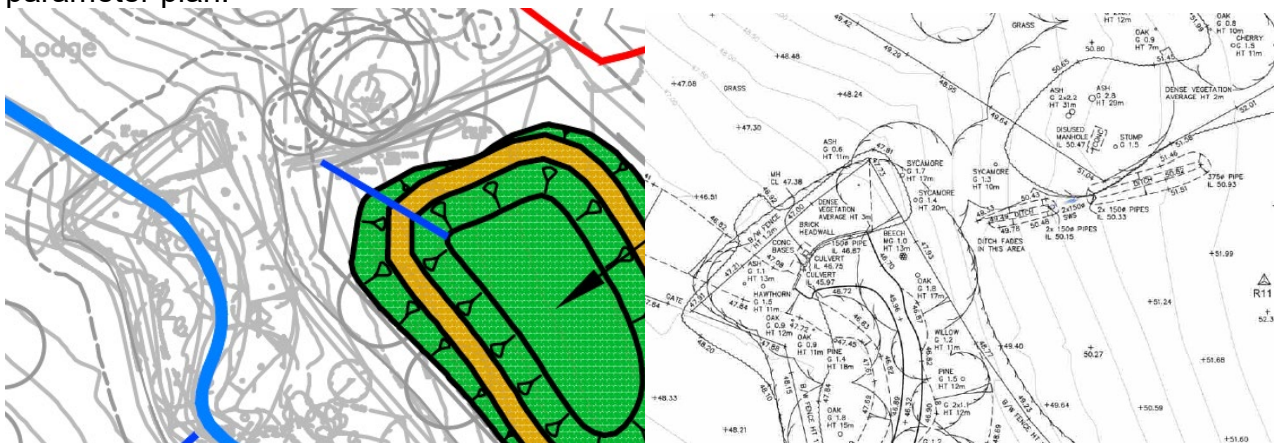
Concerns regarding outfall locations:

It is unclear where the swale for Basin 4 will discharge to, as the watercourse is not on the drawing.



Similarly, it appears that Basin 2 is proposed to discharge into a ditch that, based on the topographical survey, does not have onward connectivity, as there is a label “ditch fades in this area”.

Based on the information submitted it is assumed that the watercourse is culverted from the location of the ‘pond’, under Two Mile Ash Road, then the watercourse reopens within the grounds of Christs Hospital School. The details of this culvert (route, capacity and condition) and onwards connectivity of the watercourse are unknown currently and as such further investigation is required. This is to ensure that this watercourse is able to receive flows without increasing flood risk elsewhere. If it is found that the watercourse cannot receive these flows, alternatives will need to be explored at outline stage, to ensure there is a viable method of draining the north catchment. This is not something we can condition for reserved matters/detailed design stage, as if it is found that the watercourse does not have onward connectivity, this is likely to require alterations to the parameter plan.



For avoidance of doubt, the onward connectivity of all watercourses that it is proposed to discharge surface water at restricted rates to, must be demonstrated at outline stage.

Maintenance easements:

As stated in pre-app, the appropriate maintenance easements for the watercourses and SuDS feature must be clearly shown on drawings. This is not the case currently.

Calculations:

As stated in pre-app, a Cv value of 1 shall be used in calculations. Whilst we cannot check the outputs for Annex D adequately currently (see Point 8/9), paragraph 8.3.4 states that Cv values are set at 0.75 and 0.84 instead.

We would expect the total volume in the hydraulic calculations to correspond with the drainage layout. For example, for Basin 3, the drainage layout says the storage volume will be 425m³, whereas the calculations say 427.176m³. It is important these match.

This means that we currently cannot check the post development greenfield runoff rates and volumes properly in Annex D.

In the hydraulic calculations, there seems to be no outputs demonstrating the correct impermeable area has been used. In addition, we are currently unable to check the input parameters for the calculations, as this is not provided within the current outputs. We typically see quick storage estimates for an outline application.

Surface Water Flood Risk:

We would suggest that the Risk of Flooding for Surface Water map is not of a suitable scale for this site. We have compared it with the proposed masterplan using internal mapping, however local residents, the LPA and other relevant consultees may not be able to do this.

In addition, and as stated on GOV.UK, the Flood Map for Planning mapping should be used for planning, rather than the Check Your Long Term Flood Risk Mapping.

Impermeable areas missing from drainage layout:

There appears to be areas which will be impermeable, which have not been considered in the current drainage strategy. For example, there is proposed to be a basin located in the area of the main secondary school building. Based on the drainage layout, it is unclear how the school area will drain.

In addition, we would disagree with 2.4.2, as there appears to be more than two ordinary watercourses within the site, as detailed in the topographical survey.

Other comments:

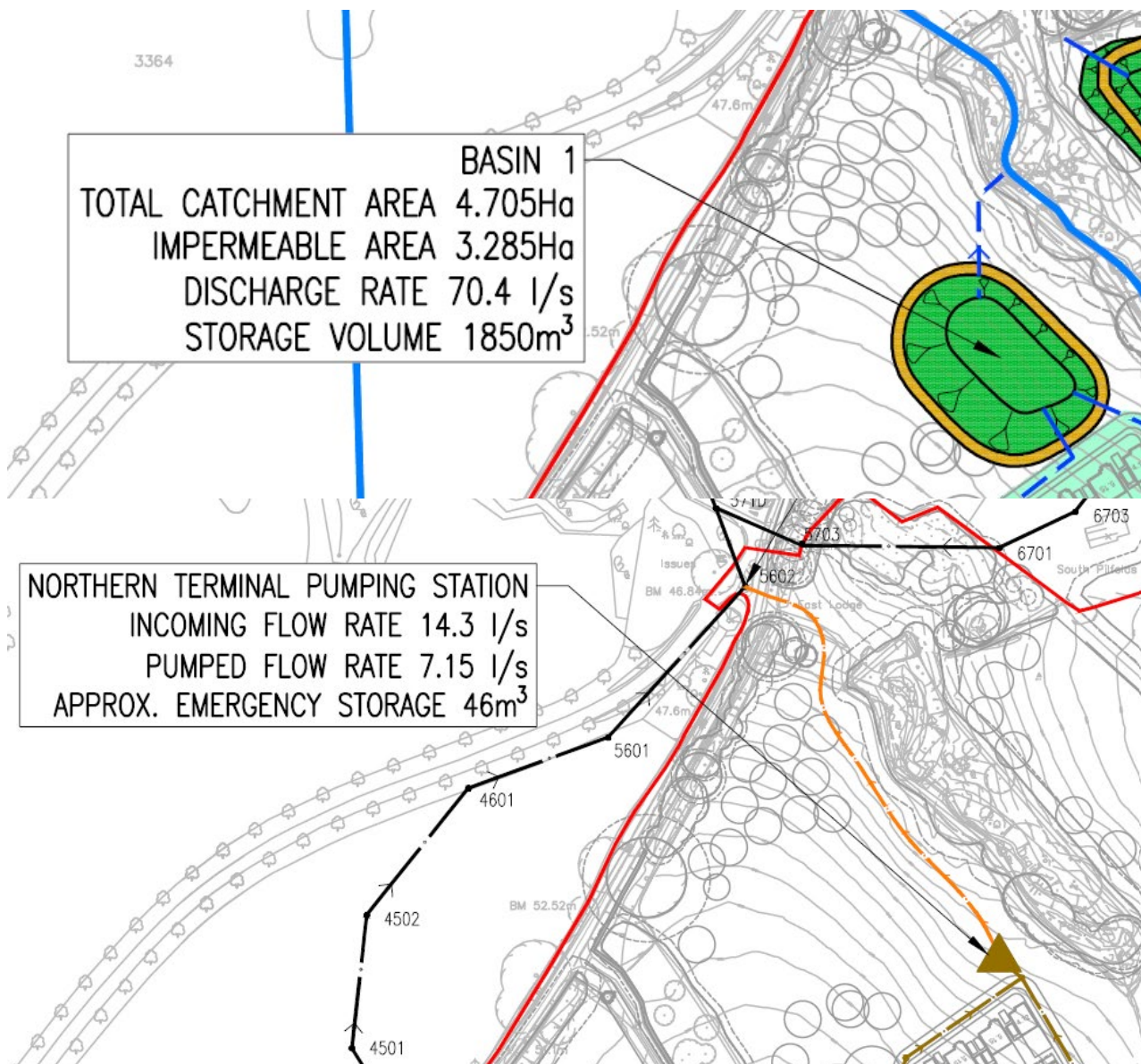
Although not a significant issue for outline planning applications, we disagree with some of the comments made in paragraph 8.2.2 in regard to non-potable use/rainwater harvesting. Higher cost is not a reason to disregard the use of rainwater harvesting. As West Sussex is seriously water stressed (this is very unlikely to change), greater consideration needs to be given to rainwater harvesting. This will also reduce water demand on the mains supply network. There are other developments which are residential which include rainwater harvesting.

We support suggestions to include rain gardens, bio retention areas and permeable paving within the residential parcels. For the school, we would also strongly encourage the use of source control SuDS features.

Within the underlying layout for the drainage strategy there are 'potential basins' – it is unclear what the function of these will be.



While foul drainage is outside our remit, there appears to be at least one clash between the surface water drainage and the foul drainage. For example, in the north of the site, basin 1 seems to be in a very similar location to the proposed location of the northern pumping station. This could create adoption issues as the site progresses.



The quality of the hydraulic calculations is poor and incredibly difficult to read. For example, see below. Due to the issues raised above, and difficulty reading the calculations, we have not completed a full review of this set of calculations, as these are likely to change.

North Southwold.	Date 09/01/2026			
	Designed by Kw	Checked by	Approved By	
Report Details Type: Stormwater Controls Storm Phase: North	Company Address			



Basin 3

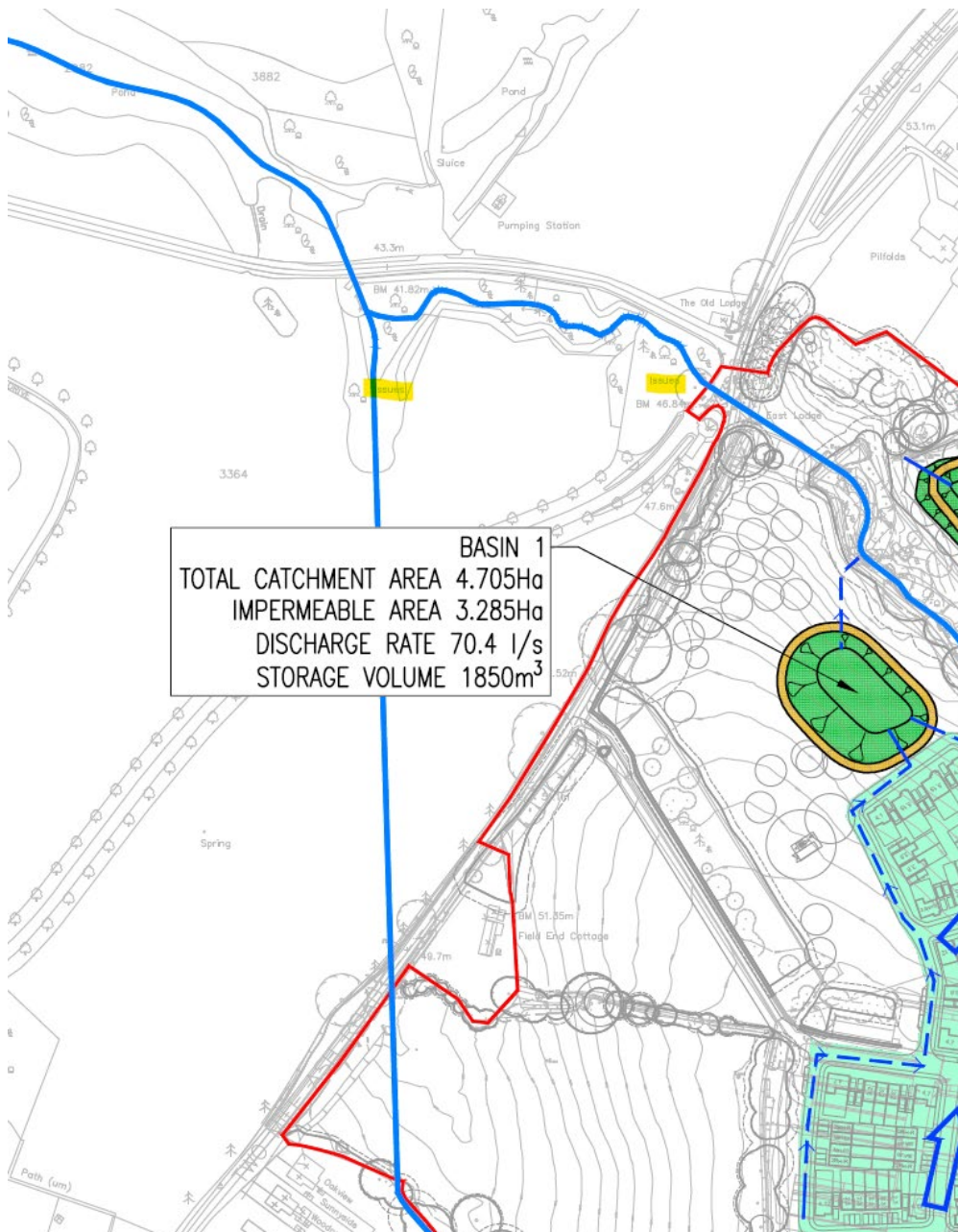
Type Pond

Dimensions

Exceedance Level (m)	57.400
Depth (m)	1.500
Base Level (m)	55.900
Freeboard (mm)	300
Initial Depth (m)	0.000
Porosity (%)	100
Average Slope (1 X)	3.00
Total Volume (m³)	427.176

Depth (m)	Area (m²)	Volume (m³)
0.000	242.95	0.000
1.500	485.90	427.176

We would suggest that the watercourse lines on the drainage strategy may not be accurate. For example, it is very rare for a watercourse to be completely straight, unless it is underground as a culverted watercourse.



Also related to watercourses, we have some concerns in relation to the topographical survey of the northern main watercourse, which has labels including: 'unable to locate headwall in this area due to flooding' 'evidence of broken pipe' and 'area flooded at time of survey'. The applicant is reminded that all watercourses within their land ownership must be maintained under the Land Drainage Act.

To allow us to ensure ground raising does not impact surface water flood risk, it would be helpful if the top of bank and the base levels of the proposed attenuation features are also included in the drainage layout. We are aware the levels are not being set at outline.

We will review this objection when the issues highlighted above are adequately addressed and we are formally reconsulted. When preparing any further documents to address the above comments, we recommend clearly highlighting where amendments have been made.

For future reference, and as discussed in pre-app, the WSCC Policy for the Management of Surface Water has been superseded by the updated National Standards for SuDS, and has been removed from our website for over a year. As discussed in the pre-app, WSCC LLFA assess surface water drainage proposals for major planning applications using the National Standards for SuDS.

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;

Environmental Statement Volume II Appendix 13.1 – Flood Risk Assessment and Outline Drainage Strategy by WSP, February 2026
Chapter 13 – Water resources, Flood Risk and Drainage in the Environmental Statement