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West Sussex
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Lead Local Flood Authority

Date 29th September 2026

Stephanie Bryant
Development Control
Albery House
Springfield Road
Horsham
RH12 2GB

Dear Stephanie,

RE: DC/26/1242 - Land Parcel at 519465 134242 Rusper Road Horsham West Sussex

Thank you for your consultation on the above site, received on 8th September 2026. We have reviewed the application as submitted and wish to make the following comments.

This is an Application for approval of Reserved Matters (layout, scale, appearance, internal access and landscaping) pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for RM Area 12 comprising 278 (C3 Use) residential units, car and cycle parking, play area, drainage, internal roads, and associated infrastructure.

Following a review of the documents, 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.

To ensure there are no properties proposed in areas of surface water flood risk, please can the Flood Map for Planning mapping be overlaid with the proposed layout.

For avoidance of doubt, the LLFA's former Policy for the Management of Surface Water referenced in 3.13 is superseded, as the National Standards for SuDS have updated.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):

10% urban creep allowance shall be used.

The exceedance plan shall include flood areas and depths for the 100 year plus 40% climate change event.

The opening for the hydrobrake at S24.1.0 is 40mm, which may create a blockage risk. Further information about how the flow controls will be protected from blockage risk is required.

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):

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

There are existing watercourses within the site. Please can these be added to the drainage layout, with minimum 3m easement from both banks for maintenance purposes.

Existing surface water flood risk:

The EA Flood Map for Planning shows that there is a flow path within the site. To enable ourselves and the LPA to check that the sequential approach is used, we request that surface water flood risk mapping is overlayed over the site layout. This will help ensure properties are not located within the flow path.

Yours sincerely,

Eleanor Read

Flood Risk Management Team

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