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Lead Local Flood Authority

Date 26/08/2026

Alice Johnson
Development Control
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Dear Alice,

RE: DISC/26/0230 - Allotment Gardens Stopham Road Pulborough.

Thank you for your consultation on the above site, received on 03/08/2026. We have reviewed the application as submitted and wish to make the following comments.

This application is for Approval of Details Reserved by Condition 9 and 10 to approved application DC/22/0661.

The LLFA have reviewed the documents submitted in relation to Condition 10, as they relate to surface water drainage. For reference, Condition 10 is worded as follows:

“Development shall not commence until details of surface water disposal, based on sustainable drainage principles, and a timetable for delivery for the residential element of the development proposals has been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The submitted details shall include details of management and maintenance responsibilities for the lifetime of the development. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure sufficient provision is made for disposal of surface water from the site in accordance with Policy 38 of the Horsham District Planning Framework (Adopted November 2015).”

We have concerns that the submitted information does not meet with the requirements above and that the proposal may increase the risk of flooding elsewhere or to the proposed development.

Our concerns and where we **require additional information** on:

- 1) A portion of the site proposes to be drained via connection to a surface water sewer, rather than infiltration.
 - a. A detailed explanation should be provided as to why it is not feasible for this area to be drained to ground in line with the rest of the site.
- 2) It is noted that the approved full application also proposed an off-site discharge; however, this was at a significantly different location, namely the central southern boundary of the site, which appears to better reflect the site's natural topography. We have several concerns regarding the revised connection proposed under this application:
 - a. The proposed connection appears to rely on a section of downstream highway drainage infrastructure. If this is the case, the connection would not be acceptable, as the highway drainage system will not have been designed to accommodate additional flows from the development. Connecting to this system would therefore increase flood risk elsewhere.
 - b. If point (a) is not applicable, the proposed connection appears to lie outside the red line boundary and still relies upon unconfirmed levels. Furthermore, the connection would appear to require the receiving system to be at a significant depth to enable gravity discharge. Given the stage of the planning process, we require confirmation of the following:
 - i. Written consent from the asset owner to connect to and discharge into the receiving system at the proposed rate.
 - ii. Confirmation that the Applicant has secured the necessary rights to undertake works on land outside their ownership or control, where applicable.
 - iii. Existing and proposed outfall/connection levels sufficient to demonstrate that the discharge can be achieved by gravity and is feasible in practice.
 - iv. A clear justification for the change from the approved drainage strategy, particularly given that the original proposal discharged at a location that appeared to follow the natural topographical fall of the site and discharge point.
- 3) **Further infiltration testing** results will be required at the proposed invert level depths and locations of all infiltration features to ensure efficacy. At present it is noted rates are extrapolated, and tests with poor results are discounted, which is insufficient at this stage (detailed design)
- 4) Half drain times for infiltration features should not exceed 24 hours for the 1 in 30 event (plus climate change allowance) in accordance with BRE Digest 365 guidance. At present the drainage calculations provided show there may be an exceedance of this for some features. Please can further calculations be provided that clearly evidence this requirement is met OR The designs / means of draining the site will need to be updated to account for this requirement.

As such, we are **unable to recommend the discharge of Condition 10 at this time**. as there is currently insufficient evidence to confirm the submitted scheme is in accordance with the previously approved plans and that flood risk will not be increased.

Upon receiving a formal reconsultation request from the LPA, when any further information is submitted, we will review our comments and provide an updated response.

Yours sincerely,

Natalie Biddulph
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

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

- Drainage Technical Note (Appendices 1-9 inclusive), Arch Associates 23.06.2026 Project No. AAL169
- Drainage Maintenance Plan, Arch Associates 23.06.2026 Project No. AAL169