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Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

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

Date 23/09/2026

Dear Alice,

RE: DC/26/0592 Land at Lower Broadbridge Farm Billingshurst Road Broadbridge Heath Horsham West Sussex RH12 3LR

Further to our recent comments dated 01/09/2026 we have been made aware of additional relevant documents available on the planning portal. Please see below original comments, updated comments in [blue](#) and latest comment in [green](#)

1. Evidence of the Applicant's conformity with Standard 1, Priority 1 of the National Standards for SuDS (collection for non-potable use), as West Sussex is classified as a water stressed area.

[This has not been addressed, the applicant should include rainwater harvesting for non-potable use within their scheme in order to comply with the NPPF.](#)

[The above remains outstanding. The outline application condition states the finalised drainage design should be 'broadly in accordance' with the FRA and Drainage Strategy submitted in May 2022. However, the submission for this application must meet current national standards with regards to specific design.](#)

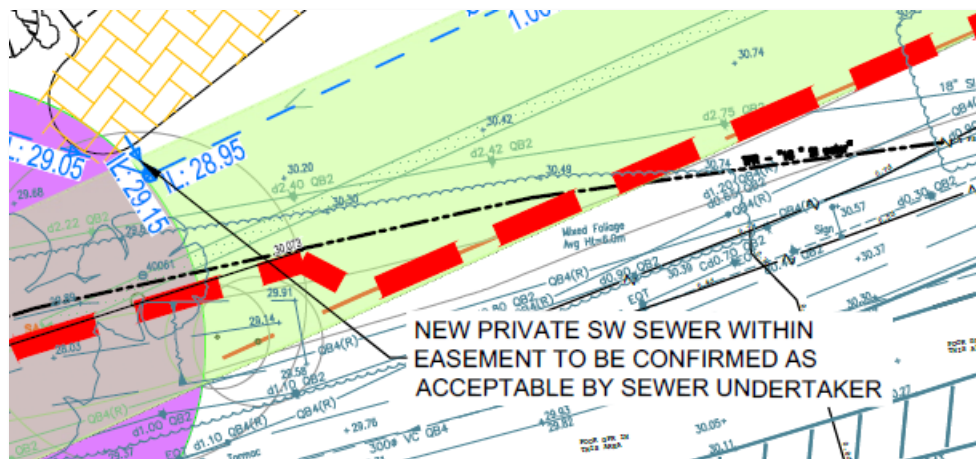
2. Please could we be provided with an updated drainage strategy layout, inclusive of the following. There appear to be a headwall to basin (S528) seemingly not in the bank, and the discharge headwall for this basin may be outside the redline boundary:
 - a. A 3m easement buffer illustrated for each watercourse bank top and attenuation basin bank top.

[The buffer has been provided for the watercourse on the boundary of the site, however not for the watercourse that runs north to south through the site, or the proposed basins. Please update accordingly to ensure no conflict with any proposed construction and that maintenance will be feasible.](#)

[This has been satisfactorily addressed](#)

[Please also advise if the below has been resolved with the sewer undertaker.](#)

[This was an updated comment and is therefore outstanding:](#)

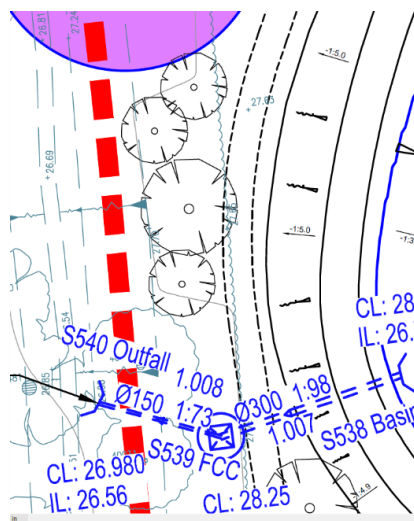


b. Hard bed levels for all watercourses on site

The ditch bed level is, at best, similar to, and in some locations higher than, the outfall levels immediately downstream of the discharge points (including S540). For effective drainage, the outfalls should be set above the receiving ditch bed level to ensure positive discharge. Where practicable, efforts should therefore be made to raise the outlet levels.

We note that the downstream culvert invert level (a fixed control level) is 25.84m, indicating that suitable outlet levels may be achievable. However, this is likely to require regrading of the receiving watercourse. Please therefore consider this matter and submit a plan detailing the proposed regrading and maintenance of the watercourses receiving discharge from the development, extending downstream to the culvert beneath the private track to the north-west of the site.

This updated comment remains outstanding, current watercourse levels as stated will not facilitate the free drainage of surface water, with outfall invert levels lower than downstream bed levels (see below example – outlet IL 26.56m AOD compared to downstream bed level 26.81m AOD – meaning outfall pipe will be submerged):



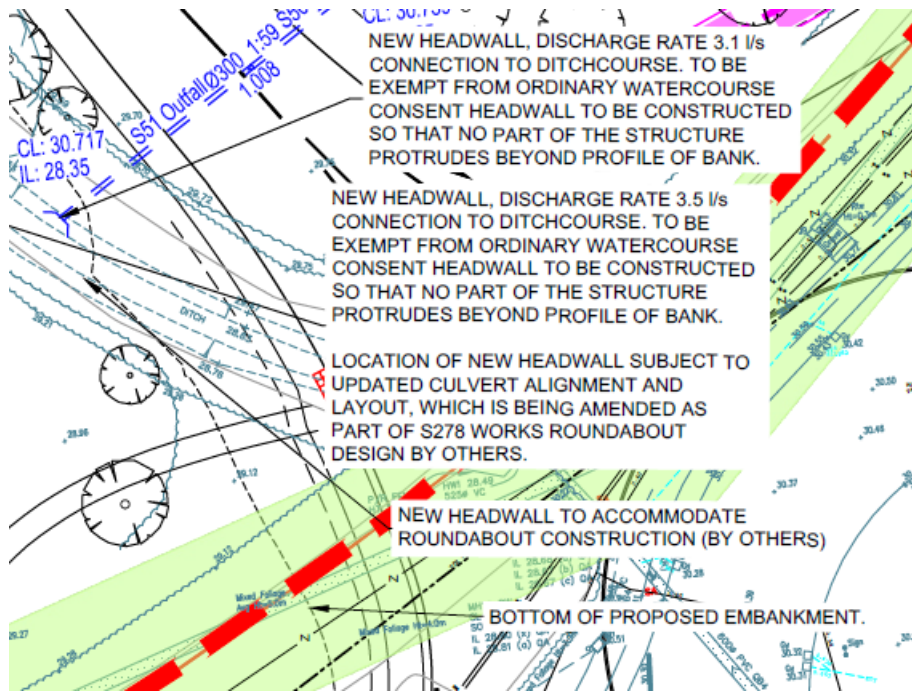
Either the outlet levels will need to be raised (recommended minimum 150mm above highest downstream ditch bed level) or the watercourse will need to be reprofiled.

- The below headwall still appears to be unconfirmed in terms of location and is currently drawn as outside the site boundary, please amend accordingly:

NEW HEADWALL, DISCHARGE RATE 2.4 l/s
CONNECTION TO DITCHCOURSE. TO BE
EXEMPT FROM ORDINARY WATERCOURSE
CONSENT HEADWALL TO BE CONSTRUCTED
SO THAT NO PART OF THE STRUCTURE
PROTRUDES BEYOND PROFILE OF BANK.
EXACT LOCATION TO BE CONFIRMED IN
DISCUSSIONS WITH ARBICULTURALIST AND
ECOLOGIST ON-SITE.

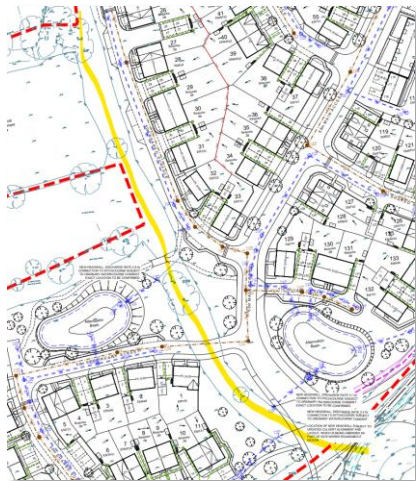
- This has been completed for outfall headwalls, however please also update for any culverts and watercourse realignment, for example in the area highlighted below (which appears to require a culvert for the access road and realignment via S278 works):

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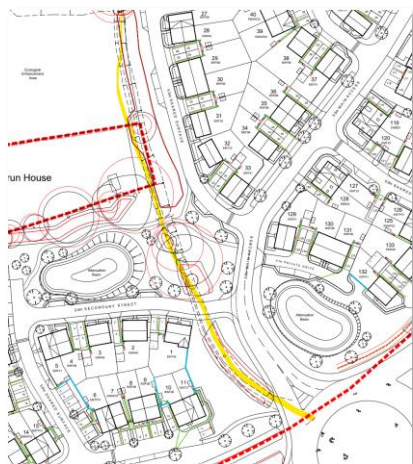


e. An exceedance route plan (this can be a separate document if required)
It is noted we have a levels strategy, however an exceedance route plan is still outstanding.
This has been provided and is satisfactory.

f. We also note there will be amendments to the existing watercourse, please ensure the plan includes the updated course as proposed:



(from drainage layout with watercourse marked in yellow)

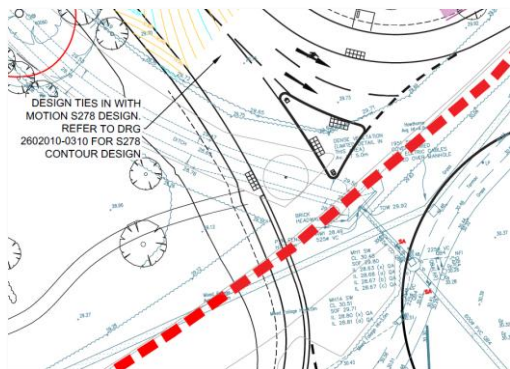


(from detailed site layout)

There are still conflicts with the revised road layout and the existing watercourse layout, see below example. We note the Applicant states at 3.5.3 *“There is an existing SW culvert which discharges into the existing watercourse on site, at the location of the new roundabout arm into the site. This is proposed to be extended into the site as part of the separate highway works, to accommodate the new roundabout design. It is not envisaged that these*

works will affect the proposed development”. However we would still require a plan showing the finalised drainage layout at this stage of planning.

The latest plan provided is acceptable, the Applicant should continue to engage with the OWC process where applicable.



3. Confirmation the below having been resolved, as this may affect the drainage layout if the easement is not feasible:



Additional levels have been provided which demonstrate no conflict.

As above

4. Please provide winter drainage calculation results (utilising a cv of 1 as has been correctly applied by the Applicant to the summer values)

This has been addressed, however there continue to be some exceedance events in the 1:100 event plus climate change allowance. Of particular concern is the flooding at S517 due to the modelled volume, this should be reviewed and amendments made to the design as necessary, or evidence provided that this can safely be accommodated on site.

The exceedance plan provided has sufficiently demonstrated that the flood risk currently modelled can be acceptably managed on site.

5. Further information is required as to how the CIRIA pollution indices will be adequately mitigated against (in accordance with Standard 4 of the National standards for SuDS). The Applicant states the below in their submission, which we would need to be confirmed/resolved as this may affect layout and materials used:

5.1.6 Based on Table 8, the site is classified as Low pollution hazard level due to the presence of only residential traffic and driveways – although the number of traffic movements from the 133 properties will need to be assessed against the Low pollution hazard index criteria.

*5.1.7 Some roads are proposed as block paving and **may** utilise permeable paving as required to reduce the pollution index, **if required**, prior to discharge to the watercourse.*

This statement has not been updated in the revised Drainage Strategy

The Applicant has now provided an updated plan inclusive of the confirmed proposed permeable paving which is acceptable for the above matter.

We will review our objection when the remaining issues highlighted above are adequately addressed and we are formally reconsulted.

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;

- Consultation response cover letter inclusive of plans:
W24149-PER-XX-XX-DR-C-02021_P7 - Drainage Strategy 1 of 2
W24149-PER-XX-XX-DR-C-02022_P7 - Drainage Strategy 2 of 2
W24149-PER-XX-XX-SK-C-00019_P2 - Exceedance Plan
W24149-PER-XX-XX-SK-C-00024_P2 - Drainage / Gas Main Sections
W24149-PER-XX-XX-SK-C-00027_P2 - Pond & Ditch Easement
W24149-PER-XX-XX-CA-C-02901_P4 - Basin 1 SW @ 7.0 ls
W24149-PER-XX-XX-CA-C-02902_P4 - Basin 2 SE @ 3.1 ls
W24149-PER-XX-XX-CA-C-02903_P4 - Basin 3 N @ 2.4 ls
W24149-PER-XX-XX-CA-C-02904_P4 - Perm Paving @ 3.5 ls
And updated microdrainage calculations:
W24149-PER-XX-XX-CA-C-02902 P6.1 Bas 14.08.2026