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Northleigh  
County Hall  
Chichester  
West Sussex  
PO19 1RH



**Lead Local Flood Authority**

Date 07/09/2026

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

Dear Sam,

**RE: DC/26/0826 Toat Cafe Stane Street North Heath West Sussex RH20 1DN**

Thank you for your reconsultation on the above site, received on 25<sup>th</sup> August 2026. We have reviewed the response to our previous comments as submitted by the Applicant dated 21<sup>st</sup> August 2026 and wish to make the following updated comments in [blue](#).

- 1) There are areas within the current design that do not follow the sequential approach with regards to surface water flood risk, in particular the block of apartments plots 71-93. Please provide a plan overlaying the EA modelled surface water flood depth data for the 1:100 year plus climate change scenario over the proposed site plan, for us to better assess residual risk once the existing hardstanding is removed and the new design implemented. Please include topographical and proposed finished floor levels. We note in the statement provided as part of the flood risk mitigation strategy, removal of existing hardstanding is advised as improving permeability. However according to other evidence provided, this site is underlain by clay and will have very low permeability in any event.

[We note the comments. At reserved matters, finished floor levels will need to take into consideration the EA modelled flood depth data for all surface water flood events. This is to ensure that the development will be safe for its lifetime.](#)

[As an advisory, the LPA should consider the sequential test requirements prior to determination of the application.](#)

- 2) Please provide details confirming the connectivity of the on-site ditches/watercourses to the wider watercourse network (survey and/or topographical data), including details of any culverts present (diameter and invert) and soft/hard bed levels for all watercourses, on and offsite. The proposed connection should be within the redline boundary of the site. Please can we have

an updated drainage strategy plan showing all on site watercourses including a 3m easement buffer, evidencing that these are continuously accessible for maintenance purposes.

While we acknowledge the comments made, we require a more detailed map clearly demonstrating the watercourse network, including any available bank and hard bed levels. The current map provided is of insufficient detail to enable an adequate assessment of the watercourses' ability to receive flows. Ability to discharge surface water is a key consideration at the outline planning stage and we must be satisfied the site has a robust method of draining without increasing flood risk offsite.

- 3) The existing watercourses can only be used to convey surface water runoff on site if it can be proven that there are no contributing areas outside of the redline boundary, please can this lack of connectivity upstream be confirmed.

The comments provided are noted and are sufficient at outline stage.

- 4) Standard 1.3 of the National Standards for SuDS states *"To utilise a lesser priority final destination, appropriate evidence shall be provided that demonstrates all higher priority final destinations have been utilised to the maximum extent practicable. Higher cost alone shall not be a reason to utilise lower priority final destinations"*. The Applicant should review their position on rainwater harvesting, as water butts in isolation may not meet the standard.

We are pleased to note that the Applicant intends to address this when a more detailed drainage design is submitted.

- 5) Please note groundwater investigations will be required if this outline application is approved.

The Applicant has committed to completing the required testing at reserved matters, which is acceptable.

As we require further detail for point 2 above, we currently **maintain our objection**. However, we will review when we are formally reconsulted by the LPA.

Yours sincerely,

Natalie Biddulph  
**Flood Risk Management Team**  
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