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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 July 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.

WSSCC Lead Local Flood Authority previously provided comments on 2nd April 2026, with some requests for further information. [Updated LLFA comments can be seen in blue.](#)

SuDS hierarchy:

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

[This has been adequately addressed for an outline planning application. We will cover further infiltration testing via conditions.](#)

Concerns regarding outfall locations:

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

This has not been adequately addressed.

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.

This is adequately addressed 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.

This is partially addressed. The fluvial flood zones rather than the surface water flood risk mapping have been included in the written response. We request the surface water flood risk from Flood Map for Planning is submitted.

The climate change layers will also need to be submitted.

It is essential that up to date mapping is used at outline stage, to ensure there are no future conflicts at reserved matters.

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, the Land Use Parameter Plan shows 'Potential Car Park Surfacing' in a small red line outside of the residential development area. The drainage layout is unclear as to how this area will drain.

There may be other areas which will be impermeable, which are not adequately included in the outline drainage strategy drawing, such as the Gypsy and Traveller Pitches.

We would suggest ensuring the catchment plan is altered to show the proposed impermeable area for each area of the site (based on the required volumes of attenuation in Annex D).

[This is adequately addressed for an outline application. When these areas are being designed, we would strongly recommend an investigation into existing drainage features is completed prior to submission of reserved matters, based on comments on the planning portal.](#)

Proposals to infill ordinary watercourses:

We have some concerns that it is proposed to infill open watercourses within the red line boundary, to allow for the construction of built development. As stated within pre-app all watercourses must be retained. Where there is opportunity to remove culverts (de-culverting) and re-open watercourses within the red line boundary, the LLFA would support this (please see comment about Ordinary Watercourse Consent).



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.

"This is not adequately addressed. SFRAs do not include all ordinary watercourses as many are not currently mapped. All Ordinary watercourses (including field ditches) should be retained and will require a suitable clear buffer (minimum 3m) from the top of the bank to be retained for future maintenance access. Any proposal to infill a watercourse requires Ordinary Watercourse Consent, which is unlikely to be given except where required for access, and in these instances, it would need to be culverted with the large diameter pipe, and over the shortest length practical.

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.

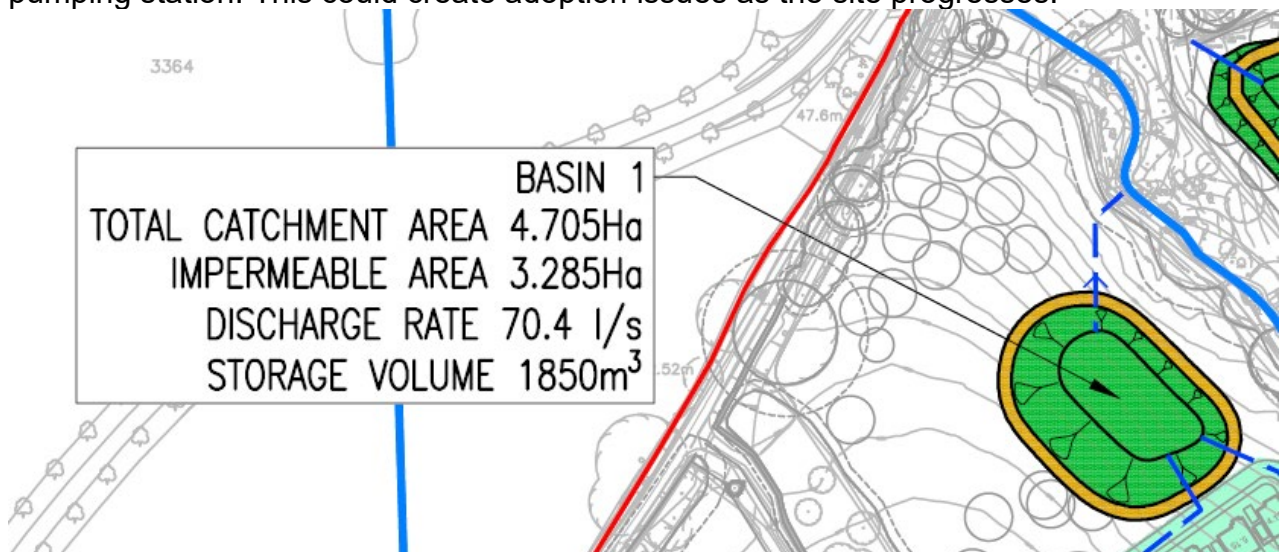
We will cover this via suitable conditions.

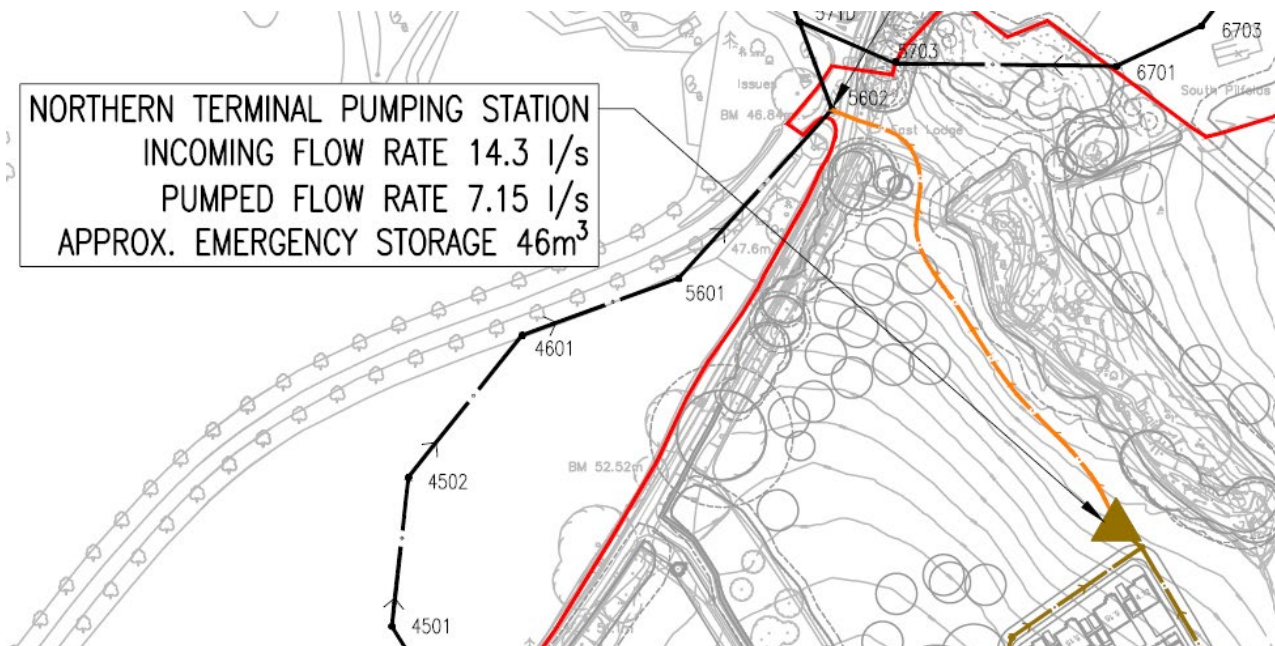
Within the underlying layout for the drainage strategy there are 'potential basins' – it is unclear what the function of these will be.



This is adequately addressed.

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.





This is adequately addressed for an outline application.

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 Southwater.	Date 08/01/2025			
	Designed by KvV	Checked by	Approved By	
Report Details Type: Stormwater Controls Storm Phase: North	Company Address			



Basin 3

Type Pond

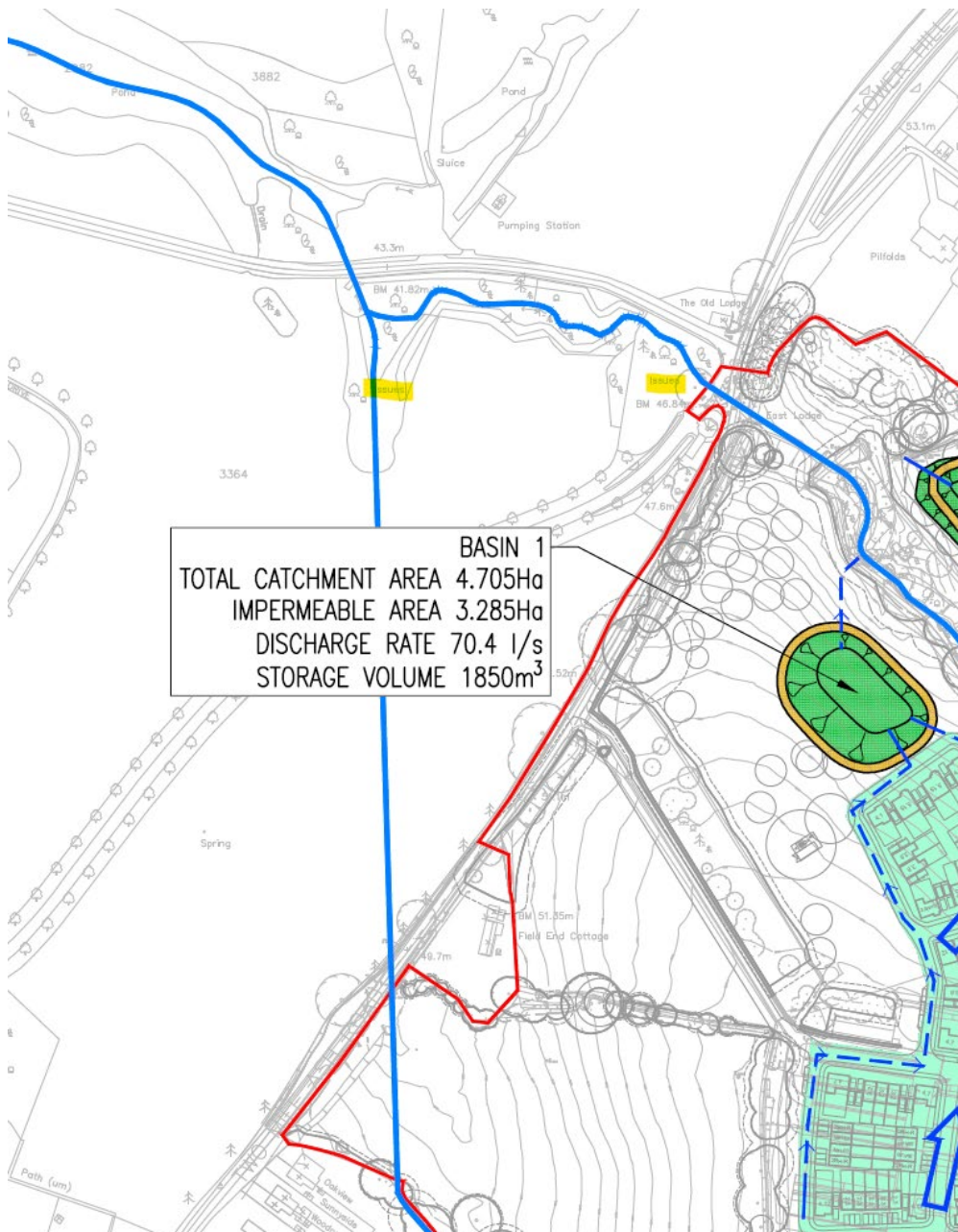
Dimensions

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	413.55	427.176

This is adequately addressed for an outline application.

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.



We would suggest altering the watercourse lines based on topographical and CCTV outputs, to better reflect the site's natural drainage.

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.

This is adequately addressed.

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.

In several locations ground raising of over 1m is proposed. This could significantly alter existing surface water flood risk. Can the applicant confirm whether this has been assessed and the outcome of the proposed ground raising?

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.

See comment above about Surface Water Flood Risk mapping.

Yours sincerely,

Eleanor Read
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