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West Sussex
PO19 1RH



Lead Local Flood Authority

Date 24th September 2026

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

Dear Stephanie,

RE: DC/26/1323 - RM Area 11 (Moathouse) Moathouse Farm Rusper Road Horsham West Sussex RH12 4QR

Thank you for your consultation on the above site, received on 3rd 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, means of internal access and landscaping) pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for RM Area 11 comprising demolition of existing garage and outbuilding and provision of 11 residential (C3) units, including single storey side extension to existing dwelling and conversion into 2 residential units and car and cycle parking, drainage, internal roads, landscaping 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.

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):

As the discharge rate for this parcel does not appear to have been agreed at outline stage, we would expect the proposed discharge rates to be as close to the greenfield runoff rates as reasonably practicable. Where this cannot be achieved, robust supporting justification should be provided. In such cases, any relaxation should be limited to a maximum of five times the greenfield runoff rate.

It is unclear whether site-specific groundwater levels have been considered in the design.

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.

Yours sincerely,

Eleanor Read
Flood Risk Management Team

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Annex:

The following documents were reviewed when responding to the application:

- Drainage Statement by Glanville, dated 29th June 2026, Issue 2