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Date 23 December 2025

Planning Reference: **DM/25/3020**

Site Address: **Land To The West Of Courthouse Farm**

Planning Description: **Outline planning application for the erection of an extra-care retirement community (Use Class C2) and community pavilion, including associated parking, outdoor amenity space, landscaping and drainage, with all matters reserved except for the new access proposed from Copthorne Common Road**

Statutory Response Due by: **23 December 2025**

Dear Joanne

Thank you for your consultation on the above site, received on 9 December 2025. For this consultation, we have reviewed the following documents submitted:

- Flood Risk and Drainage Strategy (Retirement Village), BDR Civil and Structural Engineering Consultants, 04 September 2025, Revision 1, Reference 25-0093.

The LLFA appreciates that this is an Outline application and an investigation into infiltration will be undertaken at Reserved Matters stage. This is an acceptable process, but the applicant must ensure an alternative drainage strategy is viable at the site.

The National Standards for SuDS state that the use of pumping within surface water drainage networks should only be used by exception only. Further justification is required as to why surface water cannot be drained via gravity. If pumping is required, then details on pump failure is required to ensure the proposed drainage strategy can accommodate a failure with the pumping station.

Connection to the existing ditch is proposed to discharge surface water. A survey of the existing ditch and details on wider connectivity is required to ensure it is a suitable discharge location and can manage the flows from the proposed surface water drainage network.

The LLFA also has concerns over the existing surface water flood risk and ordinary watercourse at the site and how these will be managed. It is understood that the surface water drainage network will manage surface water that falls on the site, but it is unclear whether this has taken into consideration existing flood risk originating off site. The current surface water flood risk appears to be located within areas of proposed development. Management of the existing ordinary watercourses should also be made clear.

It should be noted that the LLFA is happy with the level of detail provided within the drainage plan and the information provided on maintenance and management of the SuDS features and surface water management during construction is appropriate for an Outline application.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy / supporting information relating to:

- The application doesn't not comply with NPPF, PPG and local policies
 - Policy DP41: Flood Risk and Drainage
 - Policy DP42: Water Infrastructure and the Water Environment
- Issues outlined in the accompanied check list document.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues highlighted on the accompanying Planning Application Technical Response document are adequately addressed.

1. Further assessment of the existing surface water flood risk and how the proposed development will impact this risk is required.
2. Justification on the use of a pump within the surface water drainage network is required and details of a pump failure should be provided.
3. Information on the existing ordinary watercourses is required and an investigation into the wider connectivity of these watercourses is required to ensure an appropriate discharge location is available.
4. The CV value within the hydraulic calculations should be updated to a value of 1.

Informative:

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority. It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some

areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to the 1st April 2023. This includes those applications that are currently at an advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 and therefore, use in rainfall simulations are not accepted.

Yours sincerely

Flood Risk Management Team