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Lead Local Flood Authority

Matthew Porter
Development Control
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Date 17th April 2025

Dear Matthew,

RE: DC/25/0151 – Full Planning Application – Land To The North and South of Mercer Road Warnham

Thank you for your consultation of the above application, received on 01 April 2025. We have reviewed the submitted documentation and wish to make the following comments.

This is a full planning application for the redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping.

At present we **object** to this planning application as we have insufficient information to demonstrate the application is in accordance with NPPF, PPG Flood Risk and Coastal Change and Policy 38 in Horsham District Planning Framework.

The following additional information is required to demonstrate that flood risk will not increase elsewhere as a result of this application:

- 1) All relevant calculations and evidence as outlined in section 4 of the appended checklist (plus any other omitted information from this guidance). This is also available online here:
[Flood Risk Management Validation Checklist](#)
- 2) Calculations for runoff rates should be based upon positively drained areas only, these should be provided for the greenfield Qbar and developed scenarios. Some applicants find it easier to calculate greenfield runoff rate for 1ha then multiply it by the proposed impermeable area post development.
- 3) An updated Flood Risk Assessment (FRA) that uses the recently revised Environment Agency flood risk modelling (NaFRA2 – March 2025). This can be accessed at the following link: [Flood map for planning - GOV.UK](#)

- 4) The EA mapping indicates a surface water flow path to the West of Pondtail Farm crossing the site, as detailed in 4.2.4 of the FRA. This existing route should be maintained and construction within it should be avoided, to ensure flood risk is not increased elsewhere.
- 5) Calculations should use the latest climate change allowances for this catchment (45% for this site).
- 6) The FRA provided references the 2018 Planning Practice Guidance. This guidance was updated in 2022 and the FRA and Drainage Strategy should be updated accordingly where applicable.
- 7) Basins should be designed in accordance with the CIRIA SuDS Manual, including slopes of 1:3 (or shallower).
- 8) Pipe sizes and invert levels should be provided on the drainage plan. All watercourses on site should also be clearly marked. This should include culverted watercourses, any Network Rail culverts on or near the redline boundary and any other watercourses on or near the redline boundary. The watercourses (including culverted ones) must have a 3m easement from the top of bank to ensure riparian owners have access for maintenance purposes.
- 9) Please update plan 17085-CATCH-1 to indicate which items within the legend are proposed to be permeable/tanked.
- 10) Catchment area plan 17085-101 indicates three management catchments, however the FRA at 5.7.2 states the site will be split into four, please clarify.

Advisory to the LPA:

We have some concern over the proposed siting of the foul pumping station due to potential buffer zone requirements and increased flood risk in this portion of the site. We would recommend consulting further with the Environment Agency if you have not already done so. It is noted some of the site is located within Flood Zone 2 and 3 in updated Flood Map for Planning.

The LLFA does offer a pre-application service, and should the applicant wish to discuss further we would recommend they may still wish to apply to this service, details can be found here:

[Flood Risk Management: Pre-application advice - West Sussex County Council](#)

Upon receipt of the additional information, we will provide an updated response.

Yours sincerely,

Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Indicative Drainage Layout 17085-100 REV D
- Flood Risk Assessment dated December 2024
- Quick Storage Estimate
- Watercourses and River Catchments figure A3
- Catchment Areas/Hardscaped/Impermeable Areas: 17085 - CATCH-1, REV C
- Catchment Area Plan: 17085-101, REV B

Item	Description	APPLICANT TO COMPLETE	LPA check if it has been submitted (Yes / No)
1	<p>Proforma</p> <p>Application only be validated by LPA if the LLFA surface water pro-forma is completed and attached</p>		
2	<p>Site Surveys (if appropriate)</p> <p>Topographic survey</p> <p>Details of existing site layout, drainage, and catchment areas plus pre and post development impermeable areas</p> <p>Evidence of % increase for urban creep and how it has been applied to post development calculations</p>		
3	<p>Ground investigation including groundwater level information (for seasonally high groundwater level), potential contamination and infiltration testing (to BRE365 or similar)</p> <p>Existing drainage scheme survey e.g., CCTV or historic plans</p> <p>Survey of existing waterbodies e.g., watercourses, ponds or springs and culverts or bridges</p> <p>Plans and Drawings</p>		

Item	Description	APPLICANT TO COMPLETE	LPA check if it has been submitted (Yes / No)
	Layout drawing including drainage scheme SuDS and other water features. Including invert levels, cover levels, conveyance systems any pipe gradients, flow directions and labels that match any drainage modelling calculations. Outfall locations, control devices, attenuation systems and water quality treatment features.		
	High level construction management plan including phasing access arrangements and operational characteristics. Temporary drainage and water pollution including discharge points and flow controls should be included.		
	Landscaping planting scheme for vegetated SuDS		
	Maintenance plan and confirmation in principle of adopting authority for the lifetime of the development		
4	Assessments		
	Evidence that that the SuDS hierarchy and the 4 pillars have been met.		
	Full supporting calculations for the drainage design including design parameters using FEH and predevelopment greenfield runoff rates / volumes.		
	Critical storm simulation results of the conveyance network by level and discharge for events 100% AEP, 3.33% AEP, 3.33% AEP plus climate change, 1% AEP and 1% AEP plus climate change		

Item	Description	APPLICANT TO COMPLETE	LPA check if it has been submitted (Yes / No)
	Evidence of calculations to support the sizing of storage features to accommodate the 3.33% AEP plus climate change and 1% AEP climate change critical storms.		
	Evidence and drawing of where any flooding would occur during a 1% AEP plus climate change critical storm event would occur. Information should include extent, depth, and velocity of flooding, demonstrating that it would not leave the site boundary.		
	Flood resistance and resilience measures 300mm above flood levels		
	Drawing showing exceedance flows greater than 1% AEP plus climate change or if the drainage system is compromised.		
5	Supplementary Evidence		
	Confirmation of discharge location approval (in principal agreements from third parties if appropriate)		
	Confirmation of any consents required		
	Evidence of predevelopment discharge capacity analysis (where discharging from an existing pipe).		