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Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Jason Hawkes
Development Control
Albery House
Springfield Road
Horsham
RH12 2GB

Date 21st May 2025

Dear Jason,

RE: DC/25/0629 – Former Novartis Site, Parsonage Road, Horsham, West Sussex, RH12 5AA

Thank you for your consultation on the above site, received on 30th April 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.

Although the FRA implies this is for a reserved matters application following Outline approval DC/18/2687, we have reviewed this application as a Full application as that is what the portal says. We are aware that there is a separate planning application east of this application.

We **object** to this application as it has not been adequately demonstrated that the application is in accordance with NPPF, PPG Flood Risk and Coastal Change or Policy 42 in Horsham District Planning Framework. We will review this objection if the issues highlighted below are adequately addressed:

1. The updated Flood Map for Planning mapping must be used, to ensure the FRA is using up to date information.
2. The foul pumping station is in close proximity to the permeable paving, which could create water quality issues. Southern Water/adoption body will be best place to comment on this in more detail.
3. The catchment plan is unclear.
4. The exceedance plan shows flows could end up on the railway, which would create disruption. The exceedance plan must show the depth and area of flooding in 1 in 100 year plus climate change event.

5. In the calculations, 30 year plus climate change results are needed. The additional storage should be set to 0.
6. The greenfield runoff rate calculations appear to be missing. The applicant is reminded that brownfield sites should be limited to as close to greenfield rates as is reasonably practicable. If greenfield runoff rates cannot be achieved, we need clear evidence as to why a lower rate cannot be achieved.

As the drainage for this site is reliant on Southern Water having capacity in their surface water sewer network, we'd strongly suggest the applicant engages with them throughout, in particular because other options to drain the site are not viable (infiltration and discharge to watercourse).

Yours sincerely,

Eleanor Read
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

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

Drainage Strategy & Flood Risk Assessment by Arch Associates, 14th March 2025