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**Lead Local Flood Authority**

Stephanie Bryant  
Planning Department  
Horsham District Council  
Parkside, Chart Way Horsham,  
West Sussex,  
RH12 1RL

Date 14 February 2025

Dear Stephanie Bryant

**RE: DC/24/1676 - New Place Nurseries London Road**

Thank you for your consultation on the above site, received on 3 February 2025. We have reviewed the application as submitted and wish to make the following comments.

This is for the reserved matters application pursuant to Outline Planning Consent DC/21/2321, as varied by application DC/24/1204. The Reserved Matters comprise details of 160 no dwellings, associated internal access roads, parking and landscaping for areas east of the right of way. Details of appearance, landscaping, layout and scale to be considered.

This applicant is required to submit more details regarding the surface water flow path on site based on the and additional information regarding the drainage strategy and

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

- Further information required to demonstrate method of surface water discharge and drainage strategy
- Points outlining in accompanied document.
- Not complying with NPPF, PPG or Horsham District Councils policies 37 and 38.

**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. Re-assess flood risk based on the Environment Agency flood risk from surface water maps.
2. Include climate change in the 3.33% AEP design flood event within the calculations
3. Submission of the GRM report regarding infiltration testing results.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex Lead Local Flood 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 \(hydrosolutions.co.uk\)](#)). 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 1<sup>st</sup> 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.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

**Flood Risk Management Team**

## **Annex**

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

- Drainage Strategy, LDE, October 2024, 890815-RSK-ZZ-ZZ-RP-C-001(0)
- Flood Risk Assessment, LDE, October 2024, 681387-R1(0)-FRA