
From: Planning@horsham.gov.uk
Sent: 02 June 2026 23:10
To: Planning
Subject: Comments for Planning Application DC/26/0530

Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 02/06/2026 11:10 PM.

Application Summary

Address:	Land at Hornbrook Farm Brighton Road West Sussex
Proposal:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
Case Officer:	Nicola Pettifer

[Click for further information](#)

Customer Details

Address:	7 Ghyll Crescent Horsham
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Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Other
Comments:	Dear Sir/Madam, I am writing to formally object to the above application relating to access arrangements for the proposed development of approximately 180 dwellings at Hornbrook Farm. This objection is made on the grounds that the proposal represents a premature and piecemeal submission, which does not allow the Local Planning Authority to properly assess the principle, sustainability, and safety of the development as a whole, particularly in relation to flood risk, drainage, and site suitability. The application seeks to secure agreement on access independently of the wider development, without resolving the fundamental question of whether the site can be developed sustainably and safely. This approach is contrary to good planning practice because it prevents proper assessment of cumulative and site-wide impacts, including flood risk and drainage. This approach also risks prejudicing the determination of any subsequent full or outline application and introduces the

potential for incremental approval of a development without full scrutiny
It is not possible to determine the acceptability of access proposals in isolation where the principal environmental constraints and risks associated with the development remain unresolved.

The National Planning Policy Framework (NPPF) requires that development should be directed to areas of lowest flood risk, must not increase flood risk elsewhere and must be based on a robust understanding of flood risk from all sources

The site at Hornbrook Farm is located on elevated ground above Horn Brook and within the Upper Arun catchment, where there is a clear risk that development will increase the volume and rate of surface water runoff, accelerate flows into downstream watercourses and increase flood risk to existing properties, roads, and river systems that are already overloaded.

I am concerned that at this stage there is no satisfactory site-wide Flood Risk Assessment (FRA) addressing downstream impacts and no evidence has been provided to confirm that runoff can be controlled adequately. In short the wider hydrological impact on the Horn Brook and Upper Arun system has not been assessed.

Without resolution of these issues, the application conflicts with the core requirements of the NPPF.

The Horsham District Local Plan requires that development must be designed to avoid increasing flood risk downstream, incorporating measures to manage runoff caused by increased impermeable surfaces. In addition the Horsham District Local Plan must address the impacts of climate change, including increased storm intensity and flood risk.

Horsham District Council guidance requires that a Surface Water Drainage Strategy demonstrates compliance with national standards, clearly show that flood risk is not made worse elsewhere, and drainage solutions must be sustainable for the lifetime of the development.

The current application, in its piecemeal approach, does not demonstrate compliance with these requirements because there is no comprehensive drainage strategy supporting the development as a whole, the impact of the proposal on downstream flooding has not been quantified and the long-term operation and maintenance of drainage infrastructure is West Sussex County Council, as the Lead Local Flood Authority (LLFA), requires that major developments must include detailed drainage strategies and flood risk assessments. Surface water must be managed so that development does not increase flood risk within or beyond the site and sustainable drainage systems (SuDS) must comply with national standards and be maintainable over the long term.

The current proposal fails to demonstrate compliance because the drainage approach is incomplete and lacks technical evidence, there is no demonstrated adherence to the SuDS hierarchy or national standards and there is no secured maintenance and management plan for drainage infrastructure.

In particular, reference to drainage features such as swales is insufficient without capacity modelling, operational detail and clearly defined ownership and maintenance arrangements
The site's topographical relationship with Horn Brook raises additional concerns with regards to potential erosion and undercutting at the base of the slope into the Horn Brook, long-term land stability risks and interaction between surface water flows and soil conditions (particularly on clay substrates)

Planning policy requires that development is suitable for its ground conditions and does not create risks to property, infrastructure, or the environment over time.

No adequate evidence has been provided to demonstrate that these risks have been fully assessed or mitigated.

The absence of a

- A site-wide Flood Risk Assessment
- A compliant and detailed drainage strategy
- Evidence addressing downstream flood impacts, and
- A long-term SuDS management solution

means that the Local Planning Authority is unable to determine whether the development is acceptable in principle.

As such, the application represents a premature and piecemeal approach that seeks to advance a component of a major development without resolving the fundamental issues that determine whether the site is suitable for development.

In its current form, the proposal:

- Conflicts with the National Planning Policy Framework
- Fails to comply with Horsham District Local Plan policies on flooding and climate change
- Does not meet the requirements of the Lead Local Flood Authority

- Lacks sufficient information to enable a robust planning assessment
I respectfully request that Horsham District Council refuse this application on the grounds that it is:
- Premature and piecemeal
- Unsupported by sufficient technical evidence
- Unable to demonstrate compliance with flood risk and sustainability policies
Yours faithfully,
[REDACTED]

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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