

Lead Local Flood Authority

Planning Officer
Local Planning Authority
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1 RL

Date 27 June 2023

Dear Planning Officer

RE: DC/23/0189 Sandgate Nursery, West End Lane, Henfield, West Sussex, BN5 9RD.

Thank you for your consultation on the above site, received on 10th May 2023. We have reviewed the application as submitted and wish to make the following comments.

The LLFA understands that this is an Outline application for erection of a continuing care retirement community of up to 72 units of accommodation (Use Class C2) and up to 10 starter homes (Use Class C3) with associated community facilities including medical centre and on-site laundry and catering facilities, with access, infrastructure, open space, landscaping and associated works (all matters reserved except for access).

We **object** to this planning application in the absence of an acceptable FRA & Drainage Strategy because it is not in accordance with the NPPF, PPG Flood risk and coastal change or local policies. This means that flood risk could increase elsewhere.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 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 as highlighted on the attached document are adequately addressed. Please also note the following:

1. The submitted FRA fails to adequately demonstrate that the application will not increase flooding to the site or surrounding area, and therefore is not compliant with NPPF or Local Planning policy.
2. The FRA fails to demonstrate that there is an adequate discharge location for the site and therefore may increase flood risk to the site and surrounding area.

3. The information submitted fails to demonstrate a suitable SuDs strategy and therefore may increase flood risk to the site and surrounding area.

We will review this objection if the issues as highlighted on the attached Technical Response document are adequately addressed.

All the above details are required as they may affect site layout, volume of storage, flood risk and ground levels as this information is not contained within the FRA so the application is not in accordance with the NPPF.

For further advice on what we expect to be contained within the FRA to support a planning application, please refer to our West Sussex LLFA Policy for the Management of Surface Water on our surface water drainage webpage.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Horsham District Council and the Local Council (if they have specific land drainage bylaws). 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)). 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

The Flood Risk Management Team

Annex

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

- Flood Risk Assessment, Drainage Strategy and Water Neutrality Report, Price Myers, April 2023