

Horsham District Council - Development
Control
North Street, Horsham, RH12 1RL

Reference: PA-0005365/01
Customer reference: DC/26/0530
22 June 2026

Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.

Land at Hornbrook Farm Brighton Road Horsham

Dear Planning Officer,

Thank you for consulting us on the above application, on 2 June 2026.

We have reviewed the submitted information that is relevant to our remit and set out our position and comments below.

Environment Agency position

In the absence of an adequate flood risk assessment (FRA), we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere.

In particular, the FRA fails to take the impacts of climate change into account as there is no assessment of the impact of climate change using appropriate climate change allowances (['Flood risk assessments: climate change allowances'](#)).

This is in accordance with paragraphs 178 and 181 of the NPPF, and Policy 35 of the Horsham District Planning Framework (November 2015).

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Whilst we appreciate the proposed dwellings are situated in Flood Zone 1, there are areas of Flood Zone 3 within the site boundary, therefore climate change allowances must be considered. The applicant can apply for a Product 4 data pack from the Environment Agency and use the design flood level with climate change to consider the depths and extent of the modelled flood. Please find the relevant informative below with the contact email address.

Advice to applicant – Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](https://www.gov.uk/guidance/flood-risk-activities-environmental-permits) or contact our National Customer Contact Centre on 03708 506 506

(Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to applicant – FRA sources of information

We do not prepare or provide FRAs, however, relevant flood risk data can be ordered via our [Flood Map for Planning page](#) or our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact SSDEnquiries@environment-agency.gov.uk. Your LPA should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your LPA to determine what information is available. Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: [Flood risk and coastal change - GOV.UK](#).

Final Comments

Please note that this response is based on the information provided at this time and if this changes in the future, we would need to consider our position again. If you have any further questions, please do not hesitate to contact me.

If you are minded to approve this planning application, contrary to our advice please contact us prior to doing so, to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of condition(s) on any subsequent approval.

Yours sincerely,

Jo Purvis,

National Contact Centre: 03708 506 506

planningssd@environment-agency.gov.uk

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