

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 03 August 2026 12:51:17 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/25/2006
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 03/08/2026 12:51 PM.

Application Summary

Address:	Land East of 1 To 25 Hayes Lane Slinfold West Sussex
Proposal:	Outline application with all matters to be reserved except for access and layout, for the erection of 38no. dwellings, (including 13no. on-site affordable housing units), together with access from Hayes Lane, vehicle and cycle parking, landscaping, open space and play provision, sustainable drainage, and re-alignment of Public Right of Way No.3782, and land for a scout hut and associated parking.
Case Officer:	Sam Whitehouse

[Click for further information](#)

Customer Details

Address: 6 Mitchell Gardens Slinfold horsham

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Other - Overdevelopment
Comments:	Sam I write in response to the drainage and biodiversity reports/layout

amendments dated July 2026 on the planning portal.

1. The biodiversity report says that instead of achieving a 10% gain in BD, a deficit of 56% is made. This is partly due to the high numbers of houses on the site. Rather than agreeing to off-site remedies that would not benefit the ecology in Slinfold, the alternative would be to reduce the number of houses on the proposed site. This alternative has not been explored but should be. Eg reducing from 38 houses to 15 might mean a bio deficit of only 10-20% which could be offset locally in Slinfold.

2. The council must note that the BD deficit percentage presented is based on a baseline survey being done in February which means all wildlife would have been at a minimum. Therefore the likely deficit quoted above (56%) is likely to be far worse - a 60 to 70% deficit not 56% and that view is confirmed in the BNGai report at section 2.6.1 which admits "there is a low degree of confidence in the condition assessments." An industry accepted correction of the survey results from a winter to summer survey would mean a 20% increase in baseline biodiversity, so a 65% deficit is highly likely, equating to about 30 units. 30 offset units would be away from Slinfold as this would need to be around 17 acres of up-wilded ground. By forcing the biodiversity offset offsite, the developer would strip Slinfold of its natural environment and place the required wildlife compensation miles away in a completely different part of Sussex. There is no mention in the SLR letter how /when such offset would be achieved. Until there is a concrete plan the council cannot approve.

3. In the SLR developer letter dated 22 July 2026 it is stated that a " 'no-dig' construction on the internal road will avoid tree root damage along western site edge. The updated layout plan does not seem to adhere or reflect this new amendment. The new road levels on the western side range from being at current ground level (southern end) to being 0.5m below current ground levels. The construction depth of a typical estate road is 0.5m and the invert levels of pipes under the road are shown at 1.6m depth (eg at manhole S1) With this information, I fail to see how the 'no dig' condition can be satisfied - other than it being stated in the letter, the evidence in the plans shows the opposite. The layout of the road levels need amending and the layout plan to clearly show road levels compared to existing ground levels.

3a..There is a row of trees on the northern side of the site which are closer to the internal access road than on the western side mentioned above. The roots of the northern bordering trees also need to be protected with no-dig restrictions which at present is not mentioned.

4. The latest drawings show the previous 2025 pipe design diameters eg link 1002 in the new 2026 calculation is now

changed from 600 to 375mm yet the drawing still shows 600mm. This drawing is incorrect and not checked. What else might be wrong?

The 2026 drainage calculations now do not include underground storage tanks - T1 and t2 are missing from the calculations. Yet the drawing still shows them as does the maintenance schedule which still clearly refers to them.

So it seems we have a complete mash-up of new calculations and parts of old drawings and other related reports not being kept in sync with each other. The net result is the council needs to ask for a complete pause and reset of the submission pack. The whole submission pack needs thorough checking, updating and re-issuing so all stakeholders can check what the actual updated design really is.

5. In the latest drawings (but not the calculations), underground tanks are still being shown - therefore it is unclear whether they are part of the new design or not. However for the record, underground tanks are high maintenance. In the developers own submitted maintenance schedule they admit this as they are listed as needing MONTHLY inspection visits. The adopting authority may be offered to adopt - but with 2 of these high maintenance/ high cost items it is unlikely they will be adopted. This is not made clear by the developer who says in ...the maintenance plan, does not define which elements will be maintained/adopted by whom ... this is in contravention of wsccl saying at page 7 of the drainage statement " If there are multiple owners then a DRAWING illustrating exactly what features will be within each owner's remit must be submitted with this Proforma. Please give details of each feature and how it will be managed in accordance with the details in the management plan. " This has not been done by the developer.

6. The flood diagrams at section 2.4.3 of the new June 2026 Flood Risk Assessment & Drainage Strategy doc, clearly shows that the ditch into which all runoff water will be deposited, will be in flood without the new development. As previously highlighted in my '6 red flags' doc , the outflow from the suds system will not be able to discharge at the rate that is assumed. This is called a drowned outfall yet the software is assuming a free discharge. This is new evidence shows that the drainage calcs need to be re-run with the assumption of a full drowned ditch. The consequences of not discharging effectively into the ditch will require more water storage on-site.

7. The new drainage calculations dated June 2026, show that the freeboard in the pond will be 18.8cm. ie before the pond overtops. This margin is below the best practice figure of 50cm and below

the absolute 30cm value of standard civil engineering rules. This means there is a serious risk of flooding and as such cannot be approved. This situation will be made worse once the issue in point 6 above is addressed. The developer has to be asked to increase the volume of storage to attain at least a 30cm margin - this could be done by increasing the footprint of the pond.

8. Exceedance conditions will send water into the existing road network - ie Hayes lane and Lyons road via the ditch. Figure 2.4.3 of the June 2026 Flood Risk Assessment & Drainage Strategy doc clearly shows that both these 2 roads are under water for 1 in 100 storms and cause blockage of access to and from the village, any exceedance from the proposed site will cumulatively add to this already current flooding risk. At page 6 of the SWDS the developer admits this saying "Levels will direct exceedance flows along existing routes towards open space areas via highway corridors." In effect this means further loading Hayes Lane which is already a flood risk - this is not allowed.

9. As are no finished road/ground proposed contours presented, I cannot see where water will be flowing in the developed case. Of particular interest is around the site's new junction with Hayes lane. It appears that the new road level beyond the junction and into the site are higher than Hayes lane. Does this mean that water will flow across the junction and into Hayes lane? This question is required to be answered via the wscq question: "Which component if blocked (even partial) will lead to flooding?" This has not been answered by the developer (Surface Water Drainage Statement page 6)

10. AS I have stated before in my 6 red flag doc, pipe networks must have a minimum self-cleansing velocity of 1.0m/s to prevent silting and blockages. The developer's own 100-year table proves their layout flagrantly fails this rule: Link 1.000 runs at 0.656m/s, Link 1.004 runs at 0.641m/s, Link 2.001 drops to 0.654m/s, and Link 1.003 is at 0.437m/s. The only reason these nodes show a 'no fail' by the software, is because the engineers have applied a software override setting-indicated by the "X" in the design setting file which suppresses the automatic best practice warning alarms. Silencing the software's built-in "Low Velocity FAIL" warnings cannot disguise the physical reality that this layout is a self-clogging infrastructure failure and un-adoptable.

11. In their amendment letter of July 2026, SLR explicitly ask HDC to remove the phasing condition recommended by the LLFA, stating there is "no intention to phase the delivery of this site". Yet, Southern Water has formally admitted the foul water treatment capacity is inadequate. Given the developer's refusal to phase the scheme, a standard phased condition is inappropriate. Because they refuse to build in steps, and given the news of criminal fraud prosecutions against SW for falsifying wastewater data to hide spill failures, HDC cannot trust

unverified capacity promises. The council must stand on solid legal ground and enforce a strict Grampian Condition prohibiting any commencement or occupation until physical upgrades at the Slinfold treatment works are fully commissioned.

12. The updated layout introduces land for a new Scout Hut, the developer has yet to provide an updated Swept Path Analysis (Track Plot) drawing. My concern is the road access width and junction radius into the Scout hut looks too small to accommodate fire engines. Does the developer intend to build the access road and parking for the scout hut - or is the design indicative only? Even if the offer is a 'land only' offer, the physical practicalities of getting a fire engine vehicle to the hut has to be established to ensure it is legally viable.

13. The addition of the scout hut will bring more traffic and turning movements at the site's junction with Hayes lane. The downlink crossing of Hayes lane is approx 10m away from the site access junction. This is too close. Pedestrian, cyclists and horses will not be able to see cars about to exit the site and head towards the village. This creates an unnecessary collision risk. The junction needs to be located further away from the downlink crossing.

Kind regards

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