

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 16 May 2026 17:51:05 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
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 16/05/2026 5:51 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:	4 Ghyll Crescent Horsham
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Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Privacy Light and Noise - Trees and Landscaping
Comments:	Having thoroughly reviewed the Site-Specific Flood Risk Assessment (FRA) and Drainage Strategy prepared by Richard Jackson Engineering Consultants (Project No. 62726, dated

March 2026), alongside the formal consultation response from the West Sussex County Council (WSCC) Lead Local Flood Authority (LLFA), it is clear that the applicant has failed to demonstrate a viable, safe, or compliant surface water and groundwater management strategy.

Approval of this application in its current form would present a direct threat of flooding to both the future residents of the site and existing surrounding properties. The fundamental technical grounds for this objection are detailed below:

1. High Groundwater Vulnerability and Severe Localised Inundation Risks

The FRA acknowledges that a significant proportion of the central and northern areas of the site are designated as high-vulnerability Secondary 'A' Aquifers. Crucially, the intrusive site investigations detailed within the December 2024 Obsidian Report confirmed that the local groundwater table is exceptionally shallow, encountered at just 0.53 meters below ground level (mbgl). Developing a dense residential neighbourhood over a perched water table of this depth creates severe, long-term risks of foundation destabilisation, structural dampness, and localised groundwater flooding.

Furthermore, the applicant's report attempts to dismiss groundwater risk by citing macro-level British Geological Survey (BGS) national data to claim emergence is "unlikely." This directly contradicts the applicant's own intrusive, physical site data. Physical, on-site borehole testing must take precedence over coarse national mapping, and the applicant has failed to mitigate the documented 0.53m water table.

2. Unviable Surface Water Drainage Strategy and Failing Infiltration Testing

The proposed Sustainable Drainage Strategy (SuDS) is structurally flawed because it relies heavily on infiltration methods that have already failed site testing. The report explicitly states that soakaway testing across the central and eastern areas of the site failed, concluding they are "unlikely to provide infiltration at the adequate rate and may therefore be unsuitable."

Despite these failures, the applicant's strategy heavily relies on a single localised area (Parcel 5 / Test Pit TP25) for infiltration, while admitting that "further testing may be required at detailed design stage to confirm soakaways are feasible." National Planning Policy Framework (NPPF) guidelines dictate that the fundamental feasibility of a drainage solution must be proven prior to the granting of outline planning permission. An outline application cannot be approved on speculative drainage assumptions that are pushed to a later conditional design stage.

3. Critical Calculation Discrepancies and Under-Designed Storage Volumes

The hydraulic simulation models used to calculate the required stormwater attenuation storage on this site are mathematically flawed. As formally highlighted by the Lead Local Flood Authority (LLFA), the impermeable surface areas used in the applicant's drainage calculations do not match the developable areas listed in

Table 2 of the FRA. Because the underlying area inputs into the MicroDrainage/Source Control software are incorrect, the required attenuation basins and storage networks have been systematically under-sized.

Additionally, the applicant improperly configured the simulation software by placing a "40% Additional Flow" parameter into the overall Design Settings rather than splitting climate change allowances and urban creep into the Simulation Settings as required. The application must be refused until correct, transparent, and accurate modeling is provided.

4. Hydrological Blind Spots and Unknown Off-Site Outfall Routes
The topographic survey reveals a prominent drainage ditch/swale running along the eastern boundary parallel to Doomsday Lane, featuring an outfall that points southward. Alarming, the FRA openly admits that the exact route of this outfall south of the application's red-line boundary is "yet unknown."

The LLFA has rightly raised concerns regarding this omission. Discharging a high volume of attenuated urban runoff into an unmapped, unvetted downstream system risks overwhelming hidden, blocked, or failing third-party culverts. The applicant has failed to prove that they possess the legal right or physical capacity to discharge into this system without flooding downstream land and existing infrastructure.

5. Reliance on Outdated Frameworks and Incorrect Technical Classification

The draft iterations of this assessment incorrectly classified a major residential development as a "Less Vulnerable" use under flood risk classifications. While this was corrected to "More Vulnerable" in the final text, this fundamental misinterpretation underscores a lack of technical precision.

Furthermore, Section 7.14 of the report attempts to justify its conclusions by citing specific "LLFA guidance." In their formal response, the LLFA sharply corrected the applicant, stating: "We do not currently have detailed guidance released, therefore it is unclear what this refers to." A major development of 180 homes cannot safely be permitted based on fabricated or non-existent local policy guidance.

6. Unresolved Riparian Liabilities and Maintenance Uncertainties
The applicant has failed to provide a sustainable strategy for the long-term maintenance of the SuDS infrastructure. In the submitted SuDS Pro-forma, the applicant answered "Not yet known" when asked to identify the body responsible for maintaining these high-risk assets in perpetuity.

Furthermore, the applicant erroneously asserted that the primary receiving watercourse (Horn Brook) is managed by West Sussex County Council. The LLFA has formally denied this, clarifying that WSCC does not own this land and that riparian responsibility falls entirely on private landowners to the mid-point of Horn Brook.

Forcing complex, high-risk infrastructure maintenance onto an unconfirmed management company or untrained private riparian owners represents an unsustainable and unacceptable approach to local water management.

Conclusion and Request for Refusal

In summary, the applicant has submitted a drainage strategy that:
Proposes infiltration drainage where soakaway tests have failed.
Relies on an unmapped, unknown downstream outfall route.
Utilises flawed software calculations that under-size stormwater storage.

Ignores a hazardous 0.53m groundwater table.

The application fails to satisfy the requirements of Paragraphs 167 and 173 of the National Planning Policy Framework (NPPF), as it does not demonstrate that flood risk will not be increased elsewhere, nor does it present a secure, workable SuDS maintenance plan.

We respectfully urge the Planning Committee and Case Officer to refuse this outline application until such a time as the applicant can provide fully revised, mathematically sound calculations, clear off-site outfall maps, and a technically viable, safe drainage solution.

Kind regards

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**Horsham
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Council**

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