

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 17 May 2026 23:06:41 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 17/05/2026 11:06 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:	1. Local Hydrogeology Flaws & Contradictions on Groundwater Risk The applicant's assessment of groundwater flood risk is

fundamentally contradictory and scientifically unsafe.

The Applicant's Site Profile: The Flood Risk Assessment (FRA) establishes that the site is entirely underlain by the Upper Tunbridge Wells Sand bedrock formation, which comprises a complex succession of interbedded deposits, thinly bedded silty mudstones, siltstones, silty sandstones, and fine-grained sandstones. The report explicitly admits that the characteristics of this type of geology inherently "lend themselves to groundwater emergence due to the high but variable permeability" and open joints. This is further supported by the DeFRA Magic Map, which designates a significant proportion of the central and northern areas of the site as High Vulnerability Secondary 'A' Aquifers.

The Critical Contradiction: In Paragraph 6.5, the report references localized site investigations (the Obsidian Report from December 2024), admitting that groundwater was encountered between 0.53 meters and 2.99 meters below ground level (mbgl) across trial holes. The applicant's consultant brushes this critical data aside, labeling it as mere "perched water over the impermeable sandstone bedrock" and abruptly concludes that the potential for groundwater emergence is "unlikely" based on generalized, macro-level Environment Agency data.

Material Ground for Objection: Perched or not, water sitting less than 60cm below the surface (0.53 mbgl) poses an immediate threat of groundwater flooding, foundation dampness, and structural instability once the topsoil is stripped and heavy site excavations begin. To dismiss high localized water tables in favor of high-level, macro-scale Environment Agency mapping is a severe technical failure. The applicant has failed to provide a localized mitigation strategy or continuous groundwater monitoring data to prove how these shallow water tables will interact with deep foundation excavations and underground utility infrastructure.

2. Speculative SuDS Infiltration Strategy & "Parcel 5" Over-Reliance

The proposed Sustainable Drainage Strategy fails the fundamental tests of outline planning viability and relies on unproven, speculative assumptions.

The Infiltration Failures: Under the Sustainable Drainage Systems (SuDS) hierarchy, Priority 2 dictates that surface water runoff should be infiltrated into the ground. However, the applicant's report summarizes site-wide soakaway testing (Paragraph 7.14) and explicitly concludes that tests across the central and eastern areas of the site are "...unlikely to provide infiltration at the adequate rate and may therefore be unsuitable" due to the tight sandstone and siltstone geology.

The Speculative Exception: The applicant attempts to carve out an exception for a single localized trial hole (TP25) located on the western boundary within "Parcel 5". Yet, in Paragraph 7.15, the applicant openly concedes that this finding is entirely localized and that "further testing may be required at detailed design stage to confirm soakaways are feasible across this parcel".PDF+ 1

Material Ground for Objection: Because the tight geology renders the vast majority of the site un-filtrable, the entire outline strategy for Parcel 5 rests precariously on a single trial hole. Paragraph 7.15 admits that the developer has not yet confirmed whether soakaways are genuinely feasible. It is completely unacceptable to grant outline planning permission for an intensified layout of 180 homes when the underlying viability of the sustainable drainage system remains unproven and is deferred to a later stage. If subsequent testing proves TP25 is an anomaly, the entire drainage layout will collapse, forcing an even higher volume of un-filtrable surface water onto the local watercourse network.

3. Hydrological Stress, Peak Discharges, and Destructive "Plateauing"

The applicant's surface water management strategy poses an unacceptable hydrological and environmental threat to the Horn Brook riparian corridor.

The Peak Flow Pressure: Because the ground cannot absorb water across the main site footprint, the developer is forced to pass virtually all surface water runoff directly into the Horn Brook watercourse (Priority 3). The applicant has calculated a maximum 100% Annual Exceedance Probability (AEP) site-wide greenfield runoff rate capped at 27.5 liters per second (l/s) into the stream. To force water out of these heavily developed individual parcels via gravity, Paragraph 7.19 admits a highly intrusive design requirement: "it may be necessary to plateau the site to provide level platforms, and this will be done in conjunction with the requirements to provide gravity drainage connections to the water courses."PDF+ 4

The System Exceedance Risk: While the system is modeled around a peak rainfall climate change allowance of 45%, the applicant openly concedes in Section 12 (Residual Risks) that a surface water flood event greater than the 1.0% annual probability "may exceed the capacity of the SuDS system and cause flooding to the site."PDF+ 1

Material Ground for Objection: Squeezing 180 homes onto non-filtrable land forces an extreme over-reliance on artificial engineering. Artificially plateauing the site to force gravity drainage will require massive, destructive alterations to the natural topography of the Hornbrook Farm ecosystem. This will fundamentally disrupt localized natural overland flow routes and sub-surface hydrology. Furthermore, the scheme leaves zero margin for safety; because the developer is transforming natural fields into engineered catchments, any system exceedance or failure beyond the 1% annual probability event will immediately overwhelm the Horn Brook with accelerated volumes of water, risking severe bank erosion and downstream flooding.PDF+ 4

4. Fragmented Maintenance Framework and Long-Term Failure Risk

The proposed operational management framework for the SuDS network is structurally flawed, un-enforceable, and poses an unacceptable long-term risk of infrastructural failure.

The Fragmented Split: In Paragraph 9.1 (Management and Maintenance Plan), the applicant outlines the future operational framework for the drainage assets, stating: "The maintenance of the drainage and SuDS train within each parcel will be the responsibility of the ownership of each parcel, and the network of access roads will be the responsibility of the management team for the site."PDF

The System Operational Risks: The site is heavily segmented into distinct operational parcels, each responsible for generating and attenuating its own localized peak runoff rates before passing it down the line toward the western boundary outfalls (e.g., Parcel 1 generating 7.1 l/s, Parcel 4 generating 8.6 l/s).PDF+ 3

Material Ground for Objection: A sustainable drainage network is a single, continuous hydraulic system. Splitting the legal and physical maintenance responsibility among a patchwork of individual private property owners makes cohesive, accountable management impossible. If the private owners of "Parcel 1" or "Parcel 4" fail to properly maintain, clear, or repair their specific section of the SuDS train (such as rain gardens or swales), a critical bottleneck will form. This will cause immediate surface water backup, resulting in localized flooding across estate roads and neighboring residential properties. Outline planning permission must be refused until a single, universally accountable, centrally funded management entity or public body is legally bound to maintain the entire drainage system from source to the Horn Brook outfall.PDF+ 3

Summary of Material Flaws in Flood Risk Assessment

Kind regards

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