

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 04 June 2026 12:58:28 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 04/06/2026 12:58 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:	Reason for Objection: Material deficiencies in the applicant's Flood Risk Assessment (FRA) and Sustainable Drainage Strategy (SuDS) regarding localized groundwater conditions and

hydrogeological risks to the adjacent watercourse.

1. Introduction & Context of Objection

This objection is raised regarding the unsustainable nature of the proposed surface water drainage and attenuation strategy. The applicant's submission relies on generic regional assumptions regarding clay geology, failing to account for critical, active hydrogeological features on and immediately adjacent to the development site.

Empirical, site-specific observations demonstrate that the local water table and lateral groundwater pathways will actively compromise the proposed drainage infrastructure, resulting in a severe, unmitigated risk of off-site flooding and structural failure.

2. Evidence of Perched Water Tables & Shallow Groundwater Influx

The applicant's drainage strategy treats the underlying clay as a uniform, poorly infiltrating mass. However, physical evidence on the adjacent roughly 10-metre-high clay stream bank reveals a highly active hydrogeological system:

Active Seepage Lines: Water is continuously emerging from multiple distinct elevations along the face of the 10-metre bank adjacent to the site. This is clear empirical proof of perched water tables and significant lateral groundwater migration operating through sand/silt lenses or macro-fissures within the clay.

Rapid Sub-Surface Influx: Recent trial excavations and exploratory holes near the brook have been observed to fill rapidly with groundwater overnight. Because uniform clay exhibits exceptionally low hydraulic conductivity, rapid overnight filling proves that excavations are directly intercepting highly active, shallow water tables or highly permeable groundwater pathways.

3. Material Flaws in the Proposed Drainage and SuDS Design

Because the applicant has failed to model these specific groundwater conditions, the current design presents two critical failures:

Hydraulic Overload of Secondary Drainage: Sub-surface land drains (such as French drains or blanket drains) designed to manage surface runoff will instead continuously intercept the active shallow groundwater table. The drainage network will run at or near capacity during dry periods, leaving zero residual capacity to handle storm events, guaranteeing systemic failure and localized flooding.

Infiltration Unviability: The ground is demonstrably saturated near the surface for significant periods. Any reliance on infiltration-based SuDS (soakaways, unlined swales) is fundamentally flawed, as the soil lacks the necessary unsaturated zone to accept additional managed runoff.

4. Critical Threat to Attenuation Pond Viability

The proposed layout indicates the use of attenuation basins/balancing ponds to restrict peak runoff to greenfield rates. Based on the observed water table, the proposed attenuation strategy is structurally and hydraulically unviable:

Permanent Loss of Design Storage Volume: Because excavations fill rapidly with groundwater, any unlined attenuation basin dug to

a similar depth will naturally fill with groundwater to the level of the local water table. This severely reduces the basin's available storm attenuation volume. During a heavy rainfall event, the diminished capacity will cause the pond to overtop, resulting in catastrophic, unregulated discharge into the adjacent brook.

Hydrostatic Uplift and Liner Failure: If the applicant intends to use an impermeable geomembrane liner to isolate the pond from groundwater, the high water table will exert immense upward hydrostatic pressure beneath the liner. When the pond is drawn down or empty, this pressure will cause "whaleskinning" (buoyant ballooning), fracturing the liner, destabilizing the basin slopes, and causing structural failure of the engineered bank.

5. Conclusion & Action Required

The applicant's current drainage strategy is based on incomplete environmental data and fails to satisfy national planning policies requiring developments to ensure that flood risk is not increased elsewhere.

By altering the topography and placing heavy structural loads on a site with active, shallow groundwater migration, the development will disrupt the existing hydraulic equilibrium, forcing trapped groundwater along new, unpredictable pathways toward existing downslope properties.

We request that the Local Planning Authority defer or refuse this application until the applicant is compelled to:

- 1 Undertake a comprehensive Groundwater Monitoring Programme spanning a full winter period to accurately map the seasonal high water table and perched water lenses.
- 2 Provide a fully revised SuDS design that accounts for groundwater exclusion, structural protection against hydrostatic uplift, and explicit calculations showing how attenuation volumes will be maintained in a high water table environment.

Kind regards

Telephone:

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