

BSjap17176-20260305- RMA ConResp-LLFA v3.docx

5 March 2026

Mid Sussex Planning
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

By Email (joseph.swift@midsussex.gov.uk) ONLY

Dear Joe

**PLANNING APPLICATION DM/25/2640
BROOKLEIGH PRIMARY SCHOOL, BURGESS HILL, WEST SUSSEX**

We refer to the Lead Local Flood Authority (LLFA) letter dated 28th January 2026, addressed to Mid Sussex Planning, in relation to the above-mentioned reserved matters planning application.

We understand that the LLFA review of the application was limited to the Flood Risk Assessment and Drainage Strategy for Ref: 14176-CRH-ZZ-XX-RP-C-0001-P2.docx and dated 13 October 2025. Following which you have raised an objection to the planning application on the grounds of "the *absence of acceptable Flood Risk Assessment (FRA) and Drainage Strategy*" and further raised two main points, reproduced below:

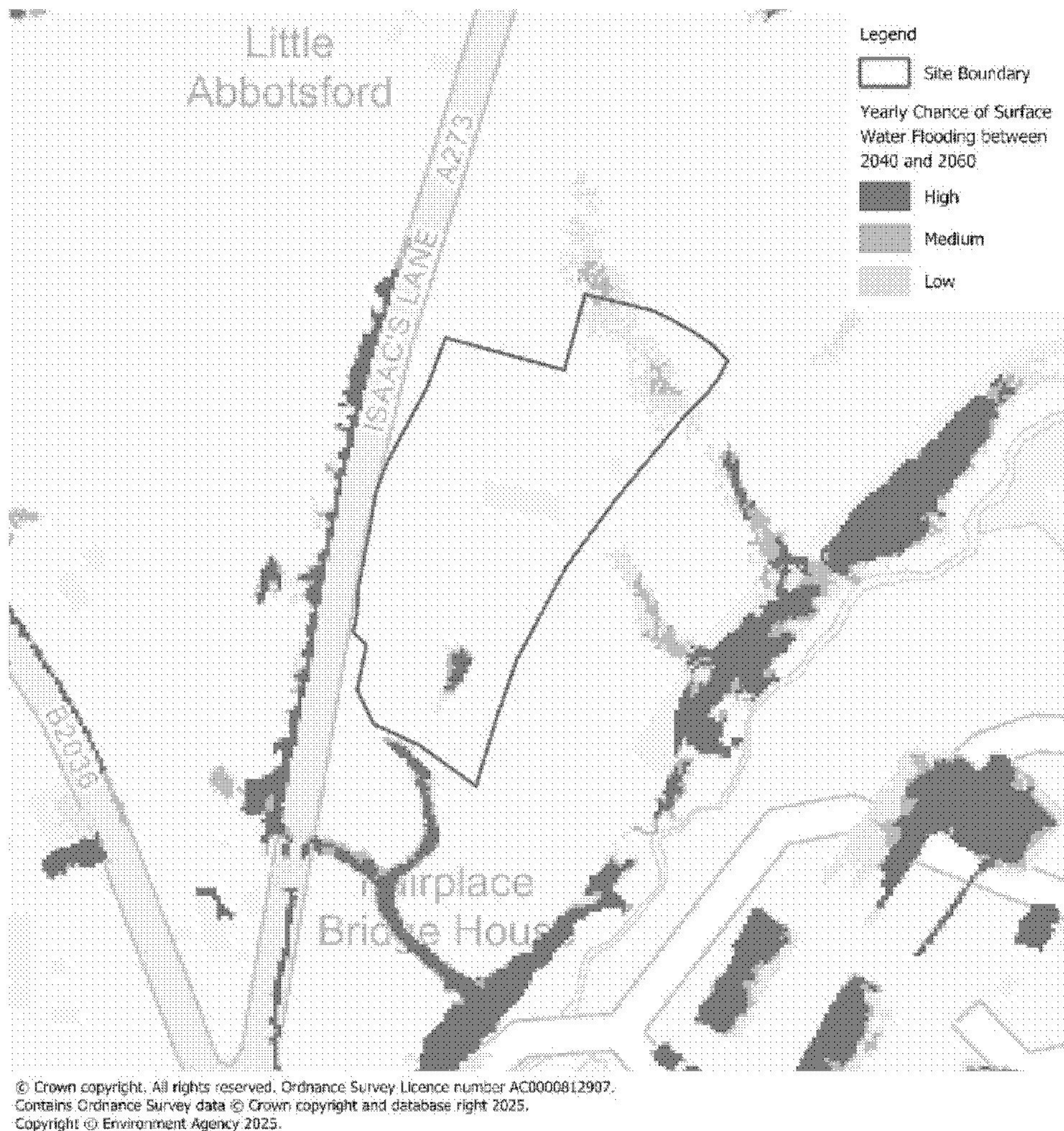
- Proposed primary school is within a surface water flow path.
- The development is not compliant with NPPF, PPG or Mid Sussex Local Planning Policy.

Please note that DM/21/3279 and DM/18/5114 have both been superseded by Section 73 application DM/23/0747, which was granted permission on 3rd October 2025. Condition 26 of DM/23/0747 requires that plans are submitted at reserved matters stage showing surface water flood extents demonstrating that the proposed buildings within the relevant reserved matters area will not be at risk of flooding. The condition further requires that surface water flow paths routes are to be maintained and only relates to buildings not playing fields.

The Flood Risk Assessment and Drainage Strategy document (FRA) referenced above, shows the existing surface water flow paths across the site and immediate wider area in Figure 5.3 on page 19 of the report and described in Section 5.7 of that report. The document further provides an extract of the Environment Agency's published NaFRA2 data, referred to as the risk of flooding from surface water (RoFSW). The RoFSW map is an assessment of where surface water flooding may occur. The guidanceⁱ from the Environment Agency further notes that surface water flooding happens when rainwater lies on or flows over the ground, instead of draining away through the normal drainage systems or soaking into the ground. It is important to note that the RoFSW does not show surface water flow paths, but rather where surface water would accumulate following a modelled rainfall event.

The guidance further clarifies that the RoFSW map shows flooding that is likely to occur as a result of rainfall with a 3.3% (1 in 30), 1% (1 in 100) and 0.1% (1 in 1000) chance of happening in any given year. Those are represented on the map in three colour bands labelled 'High', 'Medium' and 'Low' – the 'Low' representing a likelihood of occurrence of 0.1% or 1 in 1000-year rainfall event.

Figure 6.2 of the FRA is reproduced below for ease of reference:



As noted on the extract of the RoFSW map, the majority of the surface water flooding across the Primary School site is classified as Low to Medium, with an isolated area shown as High, which corresponds to the area designated for the playing field for the school (no building located at that location). The proposed school building is indeed located within an area identified as having a Low to Medium risk of flooding from surface water.

The reserved matters application for the primary school should however not be considered in isolation and the drainage provisions noted under Permitted Development DM/19/3313 and now implemented in Holmbush Avenue, within its surface water and highway drainage network. The highway drainage network on Holmbush Avenue accounts for any runoff from the carriageway and the levels for the road are no longer as per the digital terrain modelled used to generate the RoFSW.

Focussing on the red application boundary for the primary school site only, we have extracted the NaFRA2 data published by Defra and reproduced the information onto the attached drawings 14176-CRH-XX-XX-FG-G-7023-P01 and 14176-CRH-XX-XX-FG-G-7024-P01 representing the current day RoFSW and the limited climate change scenarios for the period of 2040 to 2060. The Environment Agency plans to publish further climate change data in later updates to the NaFRA2 data, but these are not currently available.

Both drawings show the likelihood of surface water accumulations across the site within different anticipated flood depths. Of note the information does not show modelled flood depths, but rather the probability of occurrence of surface water flooding reaching that depth band. Analysis of that data indicates that the probability of occurrence of 0.0m depth of surface water accumulation where the proposed primary school building is to be located is classified as Low to Medium. The granularity of the area shown as Medium risk is very small in comparison. The probability of any surface water flooding occurring at any depth beyond the 0.0m is shown to be very low across all scenarios including consideration for climate change for the period up to 2060. This indicates that the probability of surface water flooding affecting the proposed development area is less than 0.1%, rarer than the 1 in 1000-year rainfall event. Of note, current guidance and all standards only require surface water flooding and drainage to be considered for up to the 1 in 100-year rainfall event (plus climate change), which is for a probability of occurrence greater than 1%.

Even when considering the area shown as High risk of flooding, the probability of occurrence for that event is only for a flood depth of 0.0m for up to the 2060 epoch, the probability of occurrence for any other event or flood depth is nil. From that review, the probability of the site being affected by surface water flood risk is very low to Low in all scenarios up to the 2060 epoch, based upon available information.

Considering the surface water drainage proposal for the school area, as shown on the drainage layout 14176-CRH-XX-XX-DR-C-5050-P2 and contained in Appendix F of the FRA, the area around the school building is proposed to be a permeable surface (with a liner at the base), which will capture any surface water runoff in that area and direct it into the proposed surface water drainage system. The surface water drainage proposals conform with the approved surface water drainage masterplan noted on Condition 21 of DM/23/0747. Section 8.5.1 of the FRA notes that the proposed total surface water discharge rate from the development is less than what was approved under Condition 21, even with a higher climate change allowance than the original masterplan considered. The proposed surface water drainage strategy for the primary school site takes account of the pre-development surface water paths across the site and those are accounted for within the playing field drainage together with the other measures proposed and noted on drawing 14176-CRH-XX-XX-DR-C-5050-P2. The proposed surface water drainage strategy provides betterment in that the discharge from the site is restricted to the predevelopment Greenfield runoff rate Q_{bar} for all storms up to the 1 in 100-year rainfall event plus climate change allowance, thereby reducing flood risk overall.

We consider that the current proposals, under the reserved matters application fully comply with the extant outline permission DM/23/0747 and with the drainage masterplan under condition 21. Furthermore, the development proposals fully accord with the requirements set out under the National Planning Policy Framework, in particular to paragraphs 181 for mitigation of flood risk, 182 for provision of sustainable drainage systems and 187 for proposed measures to uphold and enhance the environment, all without increasing flood risk to or from the proposed development. We trust that the information provided above clarifies the matter regarding surface water flow paths and surface water flooding.

We understand that the Planning Authority, Mid Sussex District Council, is proposing to table this application at their April Committee and your views on the matter before then would be greatly appreciated.

Yours sincerely



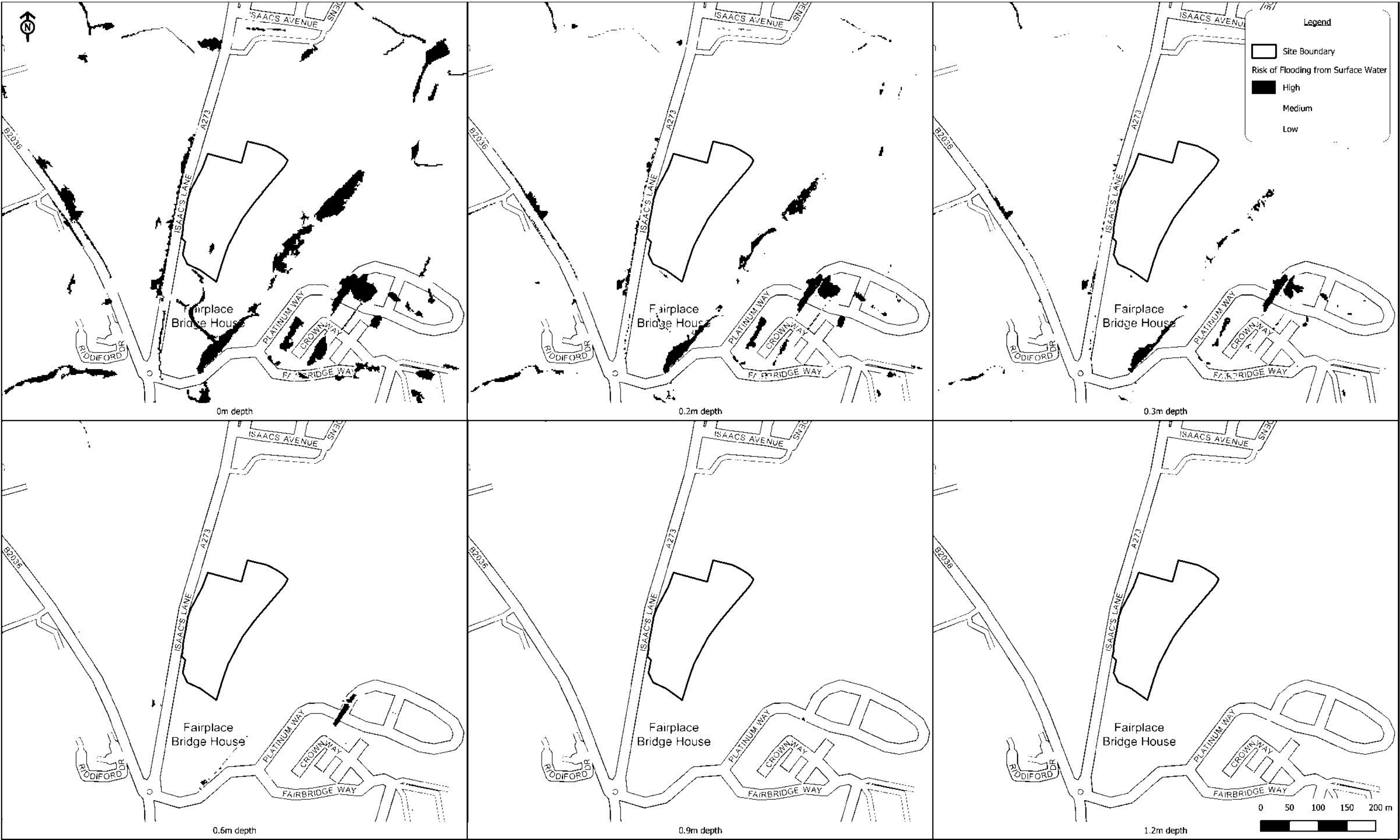
BAVA SATHAN

For and on behalf of **CAMPBELL REITH HILL LLP**

Enc. Drawings 14176-CRH-XX-XX-FG-G-7023-P01 and 14176-CRH-XX-XX-FG-G-7024-P01

c.c. Homes England
West Sussex County Council – Lead Local Flood Authority

ⁱ <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map/risk-of-flooding-from-surface-water-understanding-and-using-the-map#the-rofsw-map-and-what-it-shows>



Brookleigh Primary School
Client: Homes England

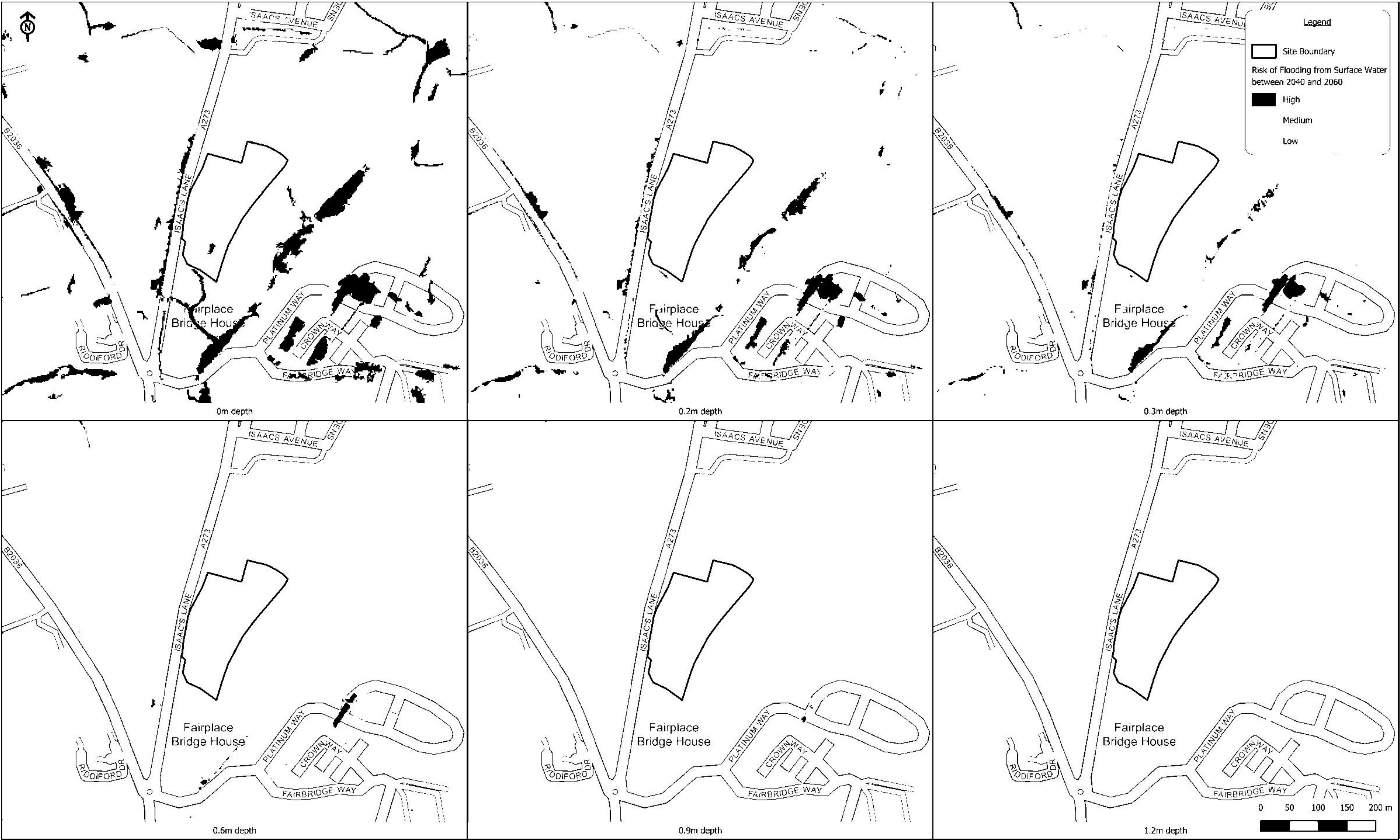
Risk of Surface Water Flooding

Scale: 1:6000@A3
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Brookleigh Primary School
Client: Homes England

Risk of Surface Water Flooding with Climate Change

Scale: 1:6000@A3
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