

Eleanor Read

Flood Risk Management Team
West Sussex County Council

Our Ref. P25012_L1

Your Ref. DM/25/3129

Date: 26th February 2026

Dear Eleanor,

Thank you for providing the recent consultation response to the proposed outline planning application for the residential led development of Land at Borde Hill Lane, Haywards Heath, West Sussex.

The consultation response has been passed through to Aqua Terra Consultants Ltd as part of our remit in supporting the proposed development.

In order to provide ease of access to each point raised within the response, we have tabulated the relevant points and our responses below. We have attached a revised report and would welcome your views/ inputs on the revised SuDS strategy ahead of formal submission.

Please feel free to come back to me with any questions or suggestions.

Yours sincerely,



James Mortimer

Director

LLFA Comment	Response
1. We have concerns that the layout shows there are houses located within a surface water flow path, which is clear evidence that the applicant has not followed a sequential approach, as highlighted by Figure 4-3 in the Flood Risk Assessment. As stated in PPG Flood Risk and Coastal Change, development in current and future medium and high surface water flood risk areas should be avoided, prior to considering mitigation measures. This is because avoidance is the most effective way of managing surface water flood risk. While mitigation has been mentioned in 6.2 of the FRA, we require additional information. The current mitigation for the main surface water flow path through the site includes using additional gullies within the road network. Although not clearly explained, it is though the applicant proposes that the flow path would then be intercepted. We are unconvinced that such an approach is appropriate. We have concerns that these proposals will not adequately mitigate the surface water flood risk. A gully is designed to accommodate a smaller rainfall event compared to the design event for a sustainable drainage system. This could mean that the proposals are ineffective in ensuring the entirety of the flow in the surface water flow path are intercepted and	The surface water flood map does indicate the flow path passing through the area of proposed housing. Whilst the flow path is present during the 1% AEP and 0.1%AEP events (with climate change), flow depths are not modelled to exceed 0.2m for all events. It is therefore not a significant quantity of water and it is considered achievable to implement mitigation measures that will keep the site safe during times of flooding. As discussed in the Flood Risk Assessment, the contributing catchment consists of: 1) A flow path from the west, which forms the majority of the catchment. Most of this is south of the road network, and is unlikely to fully drain to the flow path due to highways drains on the road and roundabout. Flow that does pass the Balcombe Road, is then likely to be intercepted by the ditch along the western boundary of the site, which will be improved with a small bund to contain flow, further reducing contribution to the surface water flow path through the Site. 2) A smaller area between Balcombe Road roundabout and the main areas of housing. This is largely permeable and therefore unlikely to respond as rapidly as the runoff from the proposed adjacent road network, although will contribute to the runoff. 3) The area of proposed housing in the lower section of the catchment. This area will be served by the drainage scheme, which accounts for runoff from 30% of permeable areas in addition to the impermeable areas, and therefore is unlikely to significantly contribute to the flow path. The concern regarding the capacity of the gullies on the road network is noted, and the proposed design has been updated to include a backfilled gravel interception trench on the upslope of the road to capture the majority of the runoff without relying on the capacity of the gullies. The underlying drainage network would be sized sufficiently to take the flow from both the interception trench and the road gullies. Small road humps will be included at each road junction to ensure any residual runoff on the roads is directed northwards, and into the open green space, rather than to the north-east towards the housing area. The proposed design contains a number of measures to ensure the residual risk of flooding to the houses is mitigated these include: 1) Primary interception through the gravel interception trench, and improvements to the western ditch 2) Secondary interception through gullies on the road network (noting that the timing of runoff from the permeable upstream catchment is likely to be slightly delayed to that on the road network) 3) Raised kerbs and road humps to direct flow that cannot be contained in the drainage network



LLFA Comment	Response
surface flows may not be able to be captured and conveyed into the drainage network beneath the highway fast enough. In addition, the road network that it is proposed to be used for mitigation is connected to the northern basin, which is located in a different natural catchment to the existing surface water flood risk. It is unclear what would occur if the highway drainage was not correctly maintained, as the surface water flow path would naturally flow downhill towards the watercourse, through an area where the applicant now proposes to situate houses. This could increase surface water flood risk elsewhere	In addition it is now proposed to raise the threshold level of those properties that lie within and adjacent to the existing flow path by 0.2m above adjacent ground levels. The surface water flood map, accounting for climate change indicates that depths along the flow path will not exceed 0.2m for all events.
2. Several drawings within the FRA and Drainage Strategy are difficult to read as they are poor resolution. Lots of the drawings we need to review are in A5, and the topographical survey, which enables us to check for ground raising and that natural catchments are being followed, are both difficult to read	A3 version of all figures within the FRA and Drainage Strategy have now been reproduced in the appendices. A separate .dwg version of the topographic survey has been provided
3. All watercourses and basins must have a minimum 3m easement from the top of both banks for maintenance access. The western ditch must be clearly shown on drawings	Western ditch now included on all drawings. 3m Easement around each basin and watercourse also indicated on drawings. Note that the easement buffer of West Common Stream and the basins overlap, however maintenance access can be shared. The easement buffer also extends over the proposed roads for some basins, however the roads are considered to form the access to these basins.



LLFA Comment	Response
4. In the calculations, the total positively drained area does not match the report. In addition, locally we require the additional storage to be set to 0. Where pipes have been intentionally oversized (which would not count as using SuDS), the modelling will account for that.	Additional storage value has now been set to 0. Total positive drained area in the model matches that in the report, however the previous exported drainage report from the software did not report the 'additional hydrograph' areas which represent the permeable surfaces that have been assumed to drain to the drainage system. The causeway flow report has been updated to include these. • Drained impermeable surfaces: 3.25ha • Permeable surfaces assumed to drain to drainage system: 2.46ha • Total positively drained area: 5.71ha
5. The drainage layout must include the discharge rates and attenuation volumes for each basin.	This has now been added to the drainage layout figure (with larger version provided in appendix)
6. There are some discrepancies between drawings for the Eastern Basin. In the drainage layout it is proposed to have the attenuation volume split over two locations, however in various other drawings the proposed basin along the straight edge of the red line is missing.	This has now been updated in all figures to show the split basins.