



Flood Risk and Drainage

Planning Application DM/24/2922
Hollyrood House, Ardingly Road, Lindfield, RH16 2QY

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Prepared by

PD Planning UK

for Town and Country Planning matters
www.pdplanninguk.com



RTPI
Chartered Town Planner

1. Purpose of this Statement

- 1.1. This Statement has been prepared in response to the Local Lead Flood Authority's (LLFA) initial observations on the planning application.

2. Background

- 2.1. The Planning Statement accompanying the application describes the nature of the development which is essentially to convert the existing 19-bed care home (Class C2) to 19 residential units (Class C3).
- 2.2. The Planning Statement includes a section on Flood Risk, Sustainable Drainage and Water Efficiency, as follows:

The 2023 National Planning Policy Framework ¹ (NPPF) refers to flood risk and the need to ensure development is not placed in areas at risk of flooding, and that new development does not increase flood risk elsewhere. The 2012 Technical Guidance to the NPPF provides additional guidance on development in areas at risk of flooding.

MSDC Policies DP41 and DP42 seek to ensure that new developments reduce flood risk and minimise the impact of flooding through the use of sustainable drainage systems, and encourage a reduction in water consumption. The 2024 Mid Sussex Strategic Flood Risk Assessment (SFRA) is also of relevance.

The site is within the Adur and Ouse Catchment Area, and as indicated on the Environment Agency's Flood Risk Maps ², it is within a Flood Zone 1 area with a very low probability of flooding and a less than a 1 in 1000 annual probability of flooding occurring from the sea or any rivers. A site within a Flood Zone 1 area is suitable for residential use and residential intensification.

¹ NPPF as updated 19th December 2023 in response to the Levelling-up and Regeneration Bill, soon to be updated following consultation over the summer of 2024.

² Environment Agency Flood Map for Planning 2024

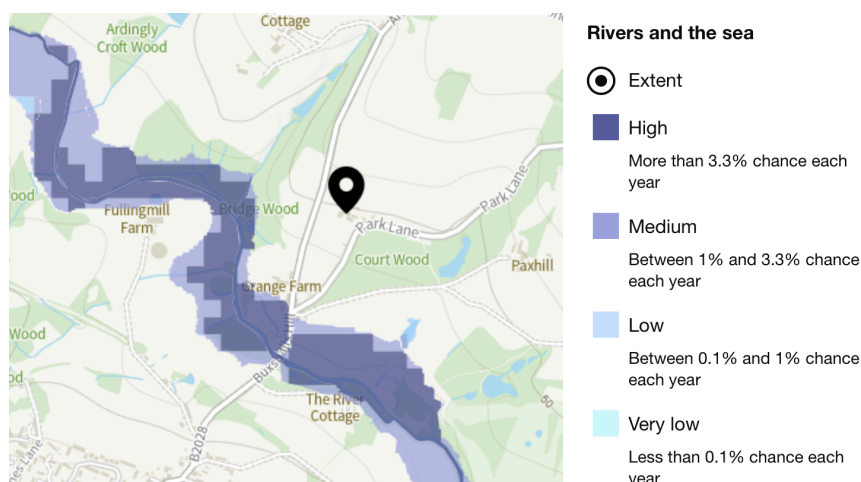


Figure 3 - Extent of flood risk from rivers
(Environment Agency Flood Risk Mapping)

The Environment Agency's Surface Water Flood (SWF) Map assesses flooding scenarios as a result of rainfall and the chance of flooding from surface water occurring in any given year. The SWF Map confirms that the site is unlikely to be affected by flooding from surface water, not surprising given the elevated position of the site on the hillside. The surrounding highway network can be susceptible to some surface water flooding, but this appears to be short-lived and insignificant.

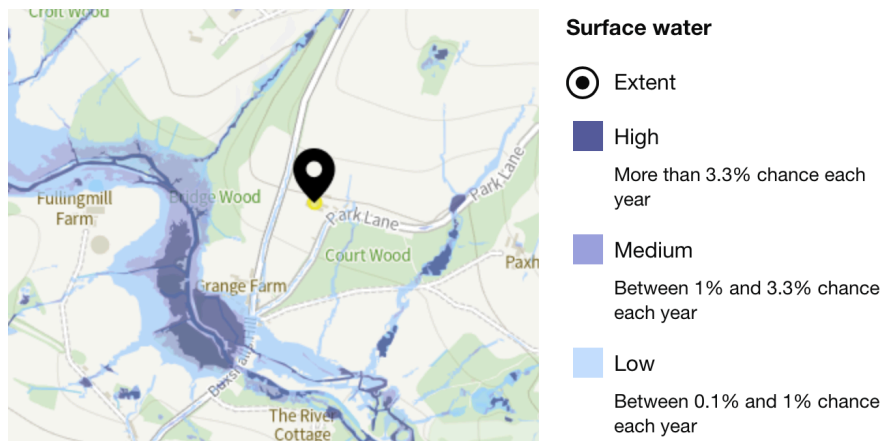


Figure 4 - Extent of flood risk from surface water
(Environment Agency Flood Risk Mapping)

Both the existing care home use and the residential dwellings use are classified as "more vulnerable" uses in NPPF Annex 3 and Table 2 of the NPPF Technical Guidance. Table 3 of the Technical Guidance confirms that these uses are entirely appropriate in a Flood Zone 1 area.

NPPF Guidance ³ also confirms that developments are unlikely to raise significant flood risk issues unless they would:

³ NPPF Planning Practice Guidance on Flood Risk and Coastal Change, paragraph 047, 15/04/2015.

- have an adverse effect on a watercourse, floodplain or its flood defences;
- would impede access to flood defence and management facilities; or
- where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.

Being a conversion of existing buildings that are central to the otherwise landscaped site, the proposal will not have an effect on any watercourse or flood management measures and it will not have an adverse effect on local flood storage capacity of flood flows. Moreover there will be a reduction in the extent of non-permeable hard surfaces and an opportunity to improve the out-dated drainage mechanisms. The conversion works will comply with Part H of the Building Regulations (Drainage and Waste Disposal) and the Surface Water Drainage Strategy will satisfy sustainable urban drainage system principles (SuDS) to manage surface water runoff as close to its source as possible. This will ensure compliance with the SuDS Hierarchy and the national Non-Statutory Technical Standards for SuDS ⁴.

The dwellings will be fitted with water meters and water-efficient sanitary ware and white goods to comply with the upper level of performance of Part G2 of Building Regulation 36(2)(b). These measures will assist in reducing water consumption to a maximum of 110 litres of water per person per day.

These measures can be secured by planning conditions to ensure that the development will comply with the NPPF and MSDC policies with regard to flood risk, sustainable drainage and water efficiency.

- 2.3. The site layout plan Drawing No.3404 18 demonstrates the areas where buildings and hard surfaces are proposed to be removed, where "natural" ground conditions will be re-instated, and where new or replacement permeable surfaces are proposed. It is evident that the conversion of the buildings does not necessitate any significant incursion outside of the existing built form, and that the curtilage of the site is sufficient to enable the natural drainage of water into the ground without leaving the site.
- 2.4. The Sustainability and Energy Conservation Statement that accompanies the application outlines the proposed inclusion of sustainable drainage measures and a reduction in water consumption.
- 2.5. The Minerals Resource Statement also provides comment on the ground levels and geology of the site as follows:

According to the British Geological Survey (BGS) the site is situated approximately 48m AOD on underlying geology comprising Head clay, silt, sand and gravel, Lower Tunbridge Wells sand and Wadhurst Clay Formation.

⁴ DEFRA Non-statutory technical standards for sustainable drainage systems (March 2015)

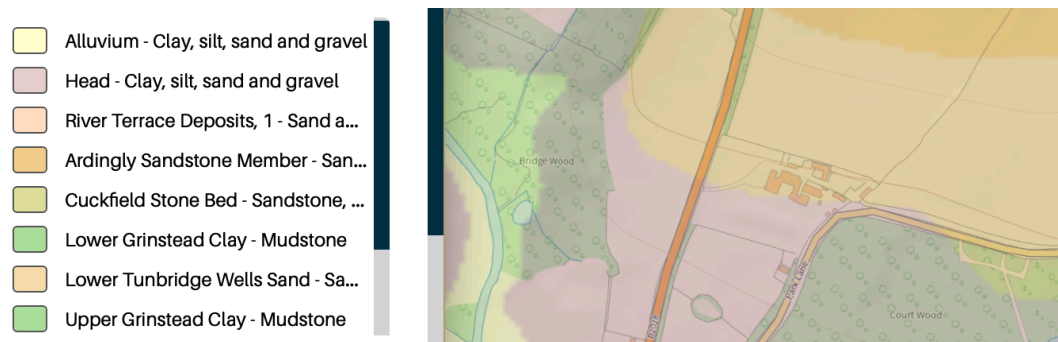


Figure 2 - BGS Geology Viewer Map Extract

- 2.6. In the light of the LLFA's comments, further consideration has been given to the location of the site within the River Ouse catchment area. As indicated in the maps below the river is just under 1km away to the south-east. The site is aligned with the 50m OD contour line, where land levels rise to the north, and lower to the south-west.

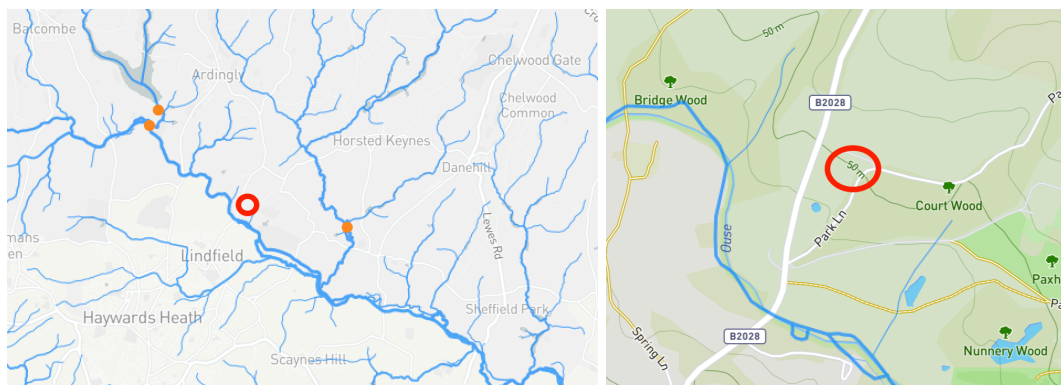


Figure 1 - Extracts from National River Flow Archive

22 results

Sort by: Distance from place

[Ouse Ardingly to confluence with Scrase Brk](#) (0.96 km) Water Body

[Scrase Bridge Stream at Haywards Heath](#) (2.11 km) Water Body

[Cockhaise Brook](#) (2.29 km) Water Body

[Ardingly Reservoir](#) (3.31 km) Water Body

[Adur & Ouse Hastings Beds](#) (3.95 km) Water Body

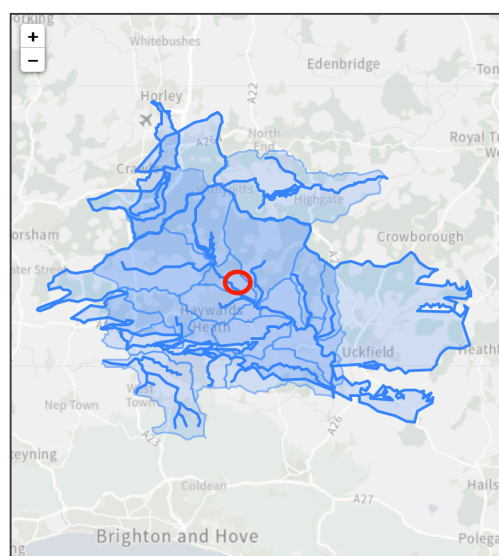
[Shell Brook upstream of Ardingly Reservoir](#) (4.80 km) Water Body

[Ouse from Slaugham to Ardingly Reservoir](#) (5.70 km) Water Body

[Pellingford Brook](#) (5.73 km) Water Body

[Sheffield Park Stream](#) (6.52 km) Water Body

[Cuckfield Stream](#) (7.02 km) Water Body



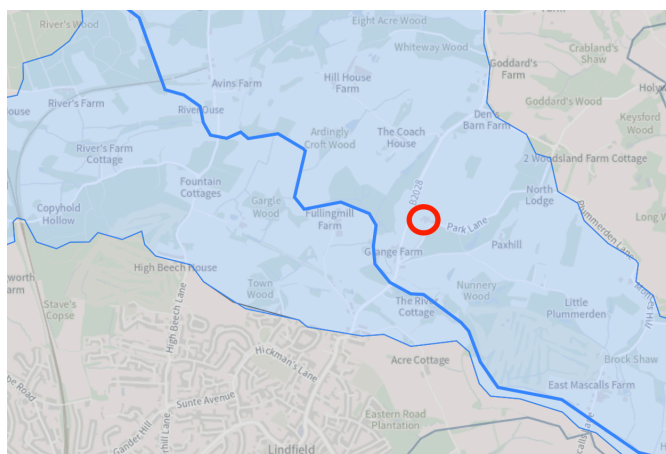


Figure 2 - Extracts from DEFRA water catchment data explorer

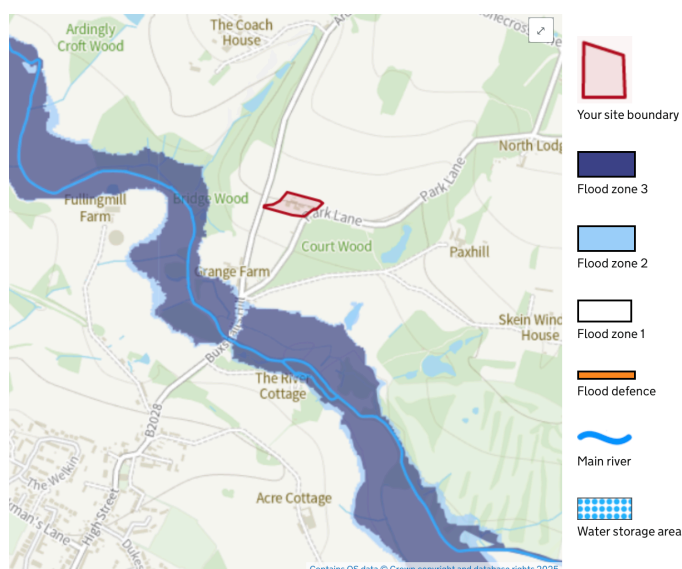


Figure 3 - Environment Agency Flood Risk Map

3. Response to LLFA observations

- 3.1. The Applicant maintains that the level of detail provided with the application is sufficient to demonstrate that the conversion of the buildings will not cause or suffer from flood risk. The site is in the lowest risk Flood Zone 1 area, the site is less than 1 hectare, and it is not identified by the Environment Agency as having critical drainage problems. The site is not at increased flood risk in future, and it introduces a less vulnerable residential use to the site (from a more vulnerable care home use). If necessary, planning conditions can ensure that this remains the case.
- 3.2. Nevertheless, further consideration has been given to the 2013 West Sussex Local Flood Risk Management Strategy (currently being updated), and the following comments are provided in response to the LLFA's Technical Response of 27th December 2024.

All sources of flooding considered?

- 3.3. There is no historic flood information or any records of any flood occurrences or events within the application site.
- 3.4. The main buildings are central to the site and set well within its curtilage, with the built form being at least 56m away from the Ardingly Road and 18m away from Park Lane. There is dense intervening woodland along the Ardingly Road frontage, natural un-made ground and fields to the south of the buildings, and natural un-made land between the buildings and the Park Road frontage.
- 3.5. The Environment Agency's Flood Risk Maps confirm that the site is within a Flood Zone 1 with a low probability of flooding from seas, rivers or reservoirs, and that there is no risk of flooding from surface water. This is not unsurprising given the nature of the site at 50m AOD.
- 3.6. The proposal will reduce the extent of the current buildings and hard surfaces across the site, to contain the built form and activity in the centre of the site, and improve the openness of the surrounding countryside. Where new hard-surfacing is provided then it will be constructed of permeable materials and incorporate sustainable drainage mechanisms in accordance with the SuDs hierarchy. This is easily achievable on this site given the extent of the grounds. Any surface water accumulation or flow from any hard surfaces or from the buildings will absorb into the surrounding natural unmade ground around the buildings and within the site curtilage.

Mitigation not appropriate

- 3.7. The site is within a Flood Zone 1 and at the lowest possible risk of flooding. It is suitable site that meets the "sequential" approach to the location of development in terms of flood risk. It follows that the "exception test" is not applicable.
- 3.8. NPPF Annex 3 confirms that the existing use as a care home is a "more vulnerable" use, the same classification as the proposed residential use. In practice, the proposed residential dwelling use is preferable to the care home use in that water consumption is likely to be less, the "vulnerability" of the residents will be not so severe, there will be fewer visitors on the site, and future residents are more likely to be ambulant and capable of dealing with any emergency situation, thereby easing the burden that the care home use could place on emergency services.
- 3.9. The current finished floor levels of the building will be retained. Any residual risk in flooding arising from the conversion of the buildings will be managed at detailed design stage, in accordance with the Building Regulations at the time of construction. The Building Regulations allow for climate change.
- 3.10. Safe access and egress from the buildings can be achieved, as per the arrangements for the former care home, whereby residents can step outside on the adjacent hard surfaces within

the site, and if necessary make their way to higher ground levels or away from the flooding event.

- 3.11. There are no watercourses within or near the site, therefore there can be no easement of 3m, nor is any consent required for works on a watercourse.

How does the site currently drain?

- 3.12. The buildings have standard drainage mechanisms including gutters, and downpipes etc, with water directed into soakaways and by infiltration into the adjoining natural ground.
- 3.13. The property is not connected to a main public sewer system, but has a below ground sewer treatment plant to the south-east of the site. This will be retained and maintained for the future use.
- 3.14. The existing hard surfaces are mostly impermeable, with water run-off to the adjoining natural ground.
- 3.15. It is inappropriate at this early planning stage to provide a drainage survey or greenfield runoff rates and volumes. If necessary the details can be secured by means of a planning condition.

Where will the site drain to?

- 3.16. There are no changes to the basic drainage infrastructure of the buildings other than renewal and replacement where necessary to meet the Building Regulations at the time of construction.
- 3.17. Surface water run-off will be dealt with through the introduction of permeable surfaces to any new or replacement hard surfaces, and sustainable drainage measures will accord with the SuDS hierarchy, to include the provision of facilities for rainwater reuse, such as water butts and storage tanks. If necessary, planning conditions can ensure the appropriate provision.

Are the 4 pillars of SuDS provided and are they multifunctional?

- 3.18. The four pillars of Sustainable Drainage Systems (SuDS) are capable of being provided. They will be designed at detailed design stage in alignment with any Building Regulations submission to to be multifunctional and ensure the provision of:
- ☒ Water Quantity Management – to control the flow and volume of surface water to prevent flooding.
 - ☒ Water Quality Improvement – to filter pollutants and contaminants before water enters natural watercourses.
 - ☒ Biodiversity Enhancement – to create habitats for wildlife, increasing ecological diversity.

- ☒ Amenity & Social Benefits - to provide green spaces for recreation, mental well-being, and community engagement.

How will the site drain without adversely effecting flood risk elsewhere?

- 3.19. The current water supply and drainage mechanisms on the building and within the grounds are sufficient for the residential use of the buildings, as they were for the former 19-bed care home use. Where deemed necessary renewed infrastructure will be incorporated to ensure efficient drainage. As per the current arrangements, surface-water arising from rainfall will drain into the natural ground surrounding the site. The new use will not therefore adversely effect flood risk elsewhere.
- 3.20. The new residential accommodation will be fitted with water-efficient sanitary ware and white goods will comply with the upper level of performance of Part G2 of Building Regulation 36(2)(b). This will assist in reducing water consumption to a maximum of 105 litres of water per person per day.

Location of SuDS

- 3.21. The Sustainability and Energy Conservation Statement (Sherwood Architects) clarifies the sustainable drainage measures that will be incorporated.
- 3.22. The SuDs measures will be placed in areas where groundworks may take place, principally where buildings or hard surfaces are to be removed or replaced. The main car parking area will be constructed of "grasscrete" type permeable surface.

What is the impact of flood risk on the development?

- 3.23. The site is within a Flood Zone 1 area with a very low probability of flooding and a less than a 1 in 1000 annual probability of flooding occurring from the sea or any rivers. The elevated position of the property at 50m AOD on a hillside with surrounding countryside indicates that the flood risk to the buildings is extremely unlikely.

How will the drainage and watercourse features be managed and maintained?

- 3.24. The Management Company to be appointed by the Landlord for the maintenance of the buildings and the grounds will be responsible for ensuring safe and efficient drainage of the buildings and its grounds. The residents will be responsible for any internal drainage mechanisms within their accommodation, such as water pipes and cisterns.

4. Conclusion

- 4.1. The Applicant has provided sufficient flood risk information proportionate to the nature of the scheme to allow the planning permission to be granted.
- 4.2. Any required measures or standards that are required to exceed the Building Regulations can if necessary be secured by planning conditions, thereby ensuring that the development will comply with the NPPF and MSDC policies with regard to flood risk, sustainable drainage and water efficiency.

end..