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Sent: 19 June 2026 10:49:47 UTC+01:00
To: "Andy Watt" <Andy.Watt@midsussex.gov.uk>
Cc: "drainage" <drainage@midsussex.gov.uk>; "Joanne Fisher" <Joanne.Fisher@midsussex.gov.uk>
Subject: 2026.06.19 Re: DM/25/1921 - Site Of Former East Lodge Farm Malthouse Lane Hurstpierpoint West Sussex BN6 9LA

Dear Andy,

Firstly, please accept our sincere apologies for the delay in responding.

The technology proposed in the application is not one that has previously been encountered by the Flood Risk and Drainage tea,, Mid Sussex District Council Building Control, West Sussex Lead Local Flood Authority, or East Sussex Lead Local Flood Authority within a planning context. As a result, we have undertaken extensive research into both the product itself and planning applications where this technology has been proposed elsewhere.

Unfortunately, the applications we identified had subsequently been withdrawn, meaning that the associated drainage consultation responses were limited and did not provide the level of detail we had hoped to review.

Please see our response below.

We have reviewed the revised Foul and Surface Water Drainage Strategy (EC49-25-20-01 Rev 01 dated March 2026) and associated drainage layout drawing EC49-25-20-E-01.

The applicant has addressed a number of the points raised within our previous consultation response. In particular:

- The drainage calculations have been updated to confirm the use of a runoff coefficient (Cv) of 1.0;
- A 45% climate change allowance and 10% urban creep allowance have been incorporated within the drainage design;
- A management and maintenance plan has been submitted.

However, the proposed drainage strategy remains wholly reliant on infiltration via proprietary ECO-90 devices for both surface water runoff and treated foul effluent disposal.

Whilst additional information has been provided regarding groundwater observations recorded during the 2020 infiltration testing exercise, the submission does not demonstrate the seasonal high groundwater level across the site, nor does it demonstrate that a minimum 1 metre separation can be maintained between the base of the proposed infiltration devices and the seasonal high groundwater level. The submitted groundwater observations represent conditions at the time of testing only and are not sufficient to demonstrate long-term groundwater separation.

The applicant should note that the proposed infiltration strategy relies upon a proprietary deep infiltration system. The submitted information does not demonstrate that site conditions are

suitable for the proposed system. The manufacturer's technical information indicates that the system is intended to operate within unsaturated soils above the natural groundwater table. No evidence has been provided to demonstrate that the proposed devices will remain within the unsaturated zone throughout the year or that adequate separation from groundwater can be maintained.

Furthermore, whilst the revised drainage layout now includes indicative stand-off distances from buildings and boundaries, no information has been provided to demonstrate that the proposed foul drainage fields, secondary treatment trenches and surface water infiltration systems are sufficiently separated from one another. Given that both the foul and surface water drainage strategies rely upon infiltration to ground, the applicant should demonstrate that the overall soakage capacity of the ground is not exceeded and that the effectiveness of the foul drainage system will not be impaired by interaction with the surface water drainage system.

The supporting information relies heavily on manufacturer performance data. However, infiltration performance is dependent upon site-specific ground conditions. Further evidence is therefore required to demonstrate that the proposed infiltration rates and drainage design are based upon testing undertaken at the proposed installation depths and locations within the site.

An updated drainage layout has been provided showing indicative stand-off distances from dwellings and boundaries. The current plans show the foul drainage fields are located within 15m of the dwellings.

At this stage of planning the applicant needs to demonstrate in principle that the site can be drained.

The following additional information is therefore required:

- Evidence of the seasonal high groundwater level across the site;
- Evidence demonstrating that a minimum 1 metre separation can be maintained between the base of the proposed infiltration devices and the seasonal high groundwater level;
- Details demonstrating that the foul drainage fields, secondary treatment trenches and surface water infiltration systems are sufficiently separated so that the overall soakage capacity of the ground is not exceeded and the effectiveness of the foul drainage system is not impaired;
- Evidence that the proposed infiltration rates and drainage design are based upon testing undertaken at the proposed installation depths and locations of the ECO-90 devices;
- Confirmation that the proposed infiltration-based surface water and foul water drainage systems remain viable having regard to the confirmed groundwater conditions;

• A measured plan demonstrating that the foul drainage fields are located at least 15m from the dwellings.

Following receipt of the above information, the Flood Risk and Drainage Team will be in a position to provide further comments.

Receipt of the requested information does not guarantee that no further information will be required and does not prejudice any future recommendation in respect of the application.

Best Wishes

Flood Risk and Drainage Team
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