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Sent: 01 July 2026 18:15:22 UTC+01:00
To: "Hamish Evans" <Hamish.Evans@midsussex.gov.uk>
Cc: "drainage" <drainage@midsussex.gov.uk>
Subject: 2026.07.01 RE: DM/25/2046 - Evergreen London Road Hassocks West Sussex BN6 9NA

Dear Hamish,

Thank you for reconsulting the Flood Risk and Drainage Team on the above application.

We have reviewed the submitted Flood Risk Assessment (June 2026) prepared by EAS Ltd, which has been provided in response to our consultation comments dated 22 January 2026, together with Southern Water's letter dated 26 June 2026.

Flood Risk

The site is located within Flood Zone 1 and is at very low risk of fluvial flooding. The Environment Agency Risk of Flooding from Surface Water mapping indicates that the site is at very low risk of surface water flooding in the present day and at medium risk with climate change (2061–2125).

The Planning Practice Guidance requires development to remain safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere. The proposed development is classified as 'more vulnerable' development under Annex 3 of the National Planning Policy Framework.

The Planning Practice Guidance and the Mid Sussex District Council Strategic Flood Risk Assessment (2024) require all sources of flood risk, including surface water flooding, to be considered consistently with fluvial flood risk.

Safe escape and Access

The submitted Flood Risk Assessment (June 2026) states that

"The proposed residents will be unrestricted in their use of the site as it will remain within Flood Zone 1. Residents should have unrestricted access to and from the site via London Road."

However, the submitted information does not adequately demonstrate that future occupants would be able to safely access or leave the site during the design surface water flood event over the lifetime of the development.

The Environment Agency Risk of Flooding from Surface Water mapping indicates that sections of London Road immediately adjacent to the site are at risk of surface water flooding in the present day and with climate change. The submitted Flood Risk Assessment has not assessed these areas or demonstrated that safe access and escape can be achieved.

The applicant has not submitted flood hazard mapping or any assessment of flood depth, velocity or hazard along the proposed access route to demonstrate that occupants would be able to safely evacuate or access the site during extreme rainfall events.

Based on the information submitted, the development has therefore failed to demonstrate that:

- safe access and escape can be achieved during the design flood event for the lifetime of the development;

Historical Flooding

Mid Sussex District Council also holds records of significant historical surface water flooding affecting both the application site and London Road immediately to the north and south of the site. The submitted Flood Risk Assessment does not address these historic flood records.

Sequential Test & Exception Test

The September 2025 Planning Practice Guidance clarification confirms that the Sequential Test must be applied where development, including buildings, access and escape routes, land raising or other vulnerable elements, would be located within areas at risk of flooding now or in the future, including climate change scenarios.

The Sequential Test may only be considered unnecessary where a site-specific Flood Risk Assessment robustly demonstrates that no part of the development, including access and escape routes, would be located within an area at risk of flooding from any source, both in the present day and taking climate change into account.

Although the proposal constitutes non-major residential development, the submitted information demonstrates that the proposed access route is affected by surface water flood risk. Accordingly, the Sequential Test is required.

The Exception Test, as set out in paragraph 163 of the National Planning Policy Framework, is intended to ensure that flood risk to people and property will be managed satisfactorily while allowing development to proceed where reasonably available sites at lower flood risk are not available.

For the Exception Test to be passed, both elements must be satisfied:

1. The development must provide wider sustainability benefits to the community that outweigh the flood risk; and
2. A site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall.

Both limbs of the Exception Test must be met in full.

No Sequential Test or Exception Test has been submitted in support of this outline application.

Furthermore, in the opinion of the Flood Risk and Drainage Team, the submitted Flood Risk Assessment does not demonstrate that the second limb of the Exception Test could be satisfied, namely that the development would be safe for its lifetime without increasing flood risk elsewhere. No information has been provided to address the first limb relating to wider sustainability benefits.

Surface Water and Foul Water Drainage

Southern Water has confirmed that there is capacity within the public foul sewer network to accept foul flows from the proposed development.

Insufficient information has been submitted to demonstrate, in principle, that surface water runoff from the development can be managed in accordance with the drainage hierarchy. The Flood Risk Assessment does not demonstrate a viable and achievable means of disposing of surface water runoff for the lifetime of the development or provide sufficient evidence that an acceptable surface water drainage strategy can be delivered without increasing flood risk on or off the site.

The Flood Risk and Drainage Team **objects** to the proposed application. The submitted information fails to demonstrate that:

- safe access and escape can be achieved during the design flood event for the lifetime of the development;
- the proposal has satisfactorily addressed the requirements of the Sequential Test and, where applicable, the Exception Test; and
- an acceptable surface water drainage strategy can be achieved in principle.

The proposal is therefore contrary to the National Planning Policy Framework, the Planning Practice Guidance for Flood Risk and Coastal Change, and Policy DP41 of the Mid Sussex District Plan.

Best Wishes

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Estate Services and Building Control
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