

Planning Application Consultation Response

Application Details

Application Number	DM/25/2149
Response Date	28.04.2026
Site Location	Land To R/O Keepers Valebridge Road Burgess Hill West Sussex RH15 0RT
Development Description	Construction of 1 no. house with attached garage and retrospective permission for the creation of a new access from Valebridge Road. (Flood Risk Assessment received 12.01.2026. Arboricultural Method Statement and tree plans received 20.04.2026. Revised description agreed 22.04.2026)
Recommendation¹	Objection

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

We understand the proposed application is for the construction of 1 no. house with attached garage and retrospective permission for the creation of a new access from Valebridge Road.

As the proposed new driveway / access is located within the Mid Sussex District Council administrative boundary, our comments relate to this element of the application only. The proposed dwelling appears to be located within Lewes District Council and therefore falls outside the jurisdiction of Mid Sussex District Council.

The application is supported by a Flood Risk Assessment (Ref: 26005-HOD-XX-XX-RP-C-5801 dated 09/01/26 by Hodel Consulting Engineers), which has been reviewed.

Flood Risk

Information

[The Planning Practice Guidance for Flood Risk and Coastal Change](#) requires all sources of flood risk to be considered consistently with how fluvial and tidal flood risk is considered within the [National Planning Policy Framework](#). This means that surface water flood risk extents should be considered comparable to flood zones when assessing a development's vulnerability to flooding and the need for a site-specific flood risk assessment.

For clarity Mid Sussex District Council's Flood Risk and Drainage Team (in line with advice from West Sussex Lead Local Flood Authority) utilise the below table when considering flood risk.

Annual exceedance	Flood Zone	Surface Water Flood Risk
Greater than 3.3% (>1:30-year)	3b	High
Between 1% and 3.3% (1:100-year and 1:30-year)	3a	Medium

¹ In line with guidance from the Planning Department the Flood Risk and Drainage Team, where considered appropriate, utilise conditions to address detailed drainage design and detailed design of flood mitigation measures.

Between 0.1% and 1% (1:1,000-year and 1:100-year)	2	Low
Less than 0.1% (<1:1,000-year)	1	Very Low

Application specific comment

The Environment Agency released updated flood risk mapping following the new National Flood Risk Assessment (NaFRA2) in early 2025. The updated mapping uses new and improved methods to assess flood risk. The site is in flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers).

The flood zones continue to reflect undefended, present-day flood risk from rivers and the sea. They do not account for climate change or the presence of flood defences, maintaining alignment with planning policy principles.

The Environment Agency released the updated Risk of Flooding from Surface Water (RoFSW) mapping on January 28, 2025.

The RoFSW was created using a combination of local flood model information and national flood modelling. These were used to generate the probabilities of flood risk for each 2m grid square of land, with the aim of using the best available flood risk information in any one location.

As well as present day (2025) risk of flooding from surface water, climate change scenarios (2040 – 2060) have been produced to indicate the predicted impacts of climate change on future flood risk.

Climate change allowances are based on the latest UK Climate Projections (UKCP18) from the Met Office. They use a mid-range allowance within [Representative Concentration Pathway \(RCP\) 8.5](#).

A near-term epoch (2040 – 2060 “2050s” epoch) and central allowances are being used initially, to support short and medium-term decisions informed by the highest flood likelihood projections.

In the absence of climate change allowances provided until 2125 (NPPF (*Guidance Flood risk and coastal change considers* “Residential development can be assumed to have a lifetime of at least 100 years” *Paragraph: 006 Reference ID: 7-006-20220825* Revision date: 25 08 2022) the Environment Agency have advised that “the time horizon [is] too short for most development types” and the “Climate change scenario [is] insufficiently precautionary” and “may be relevant to inform assessments, but additional information [is] usually needed” to established the designed flood level for the site.

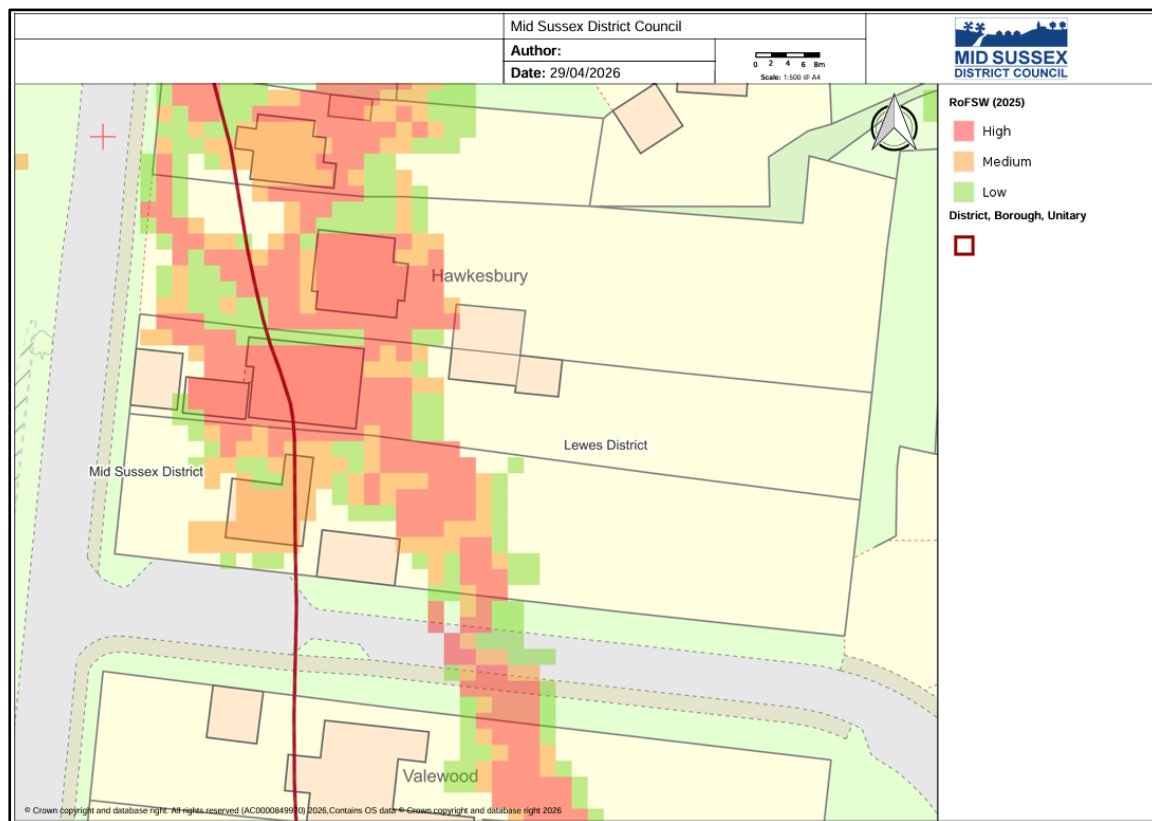


Figure 1: Risk of Flooding from Surface Water present day 2025 (Source: EA)

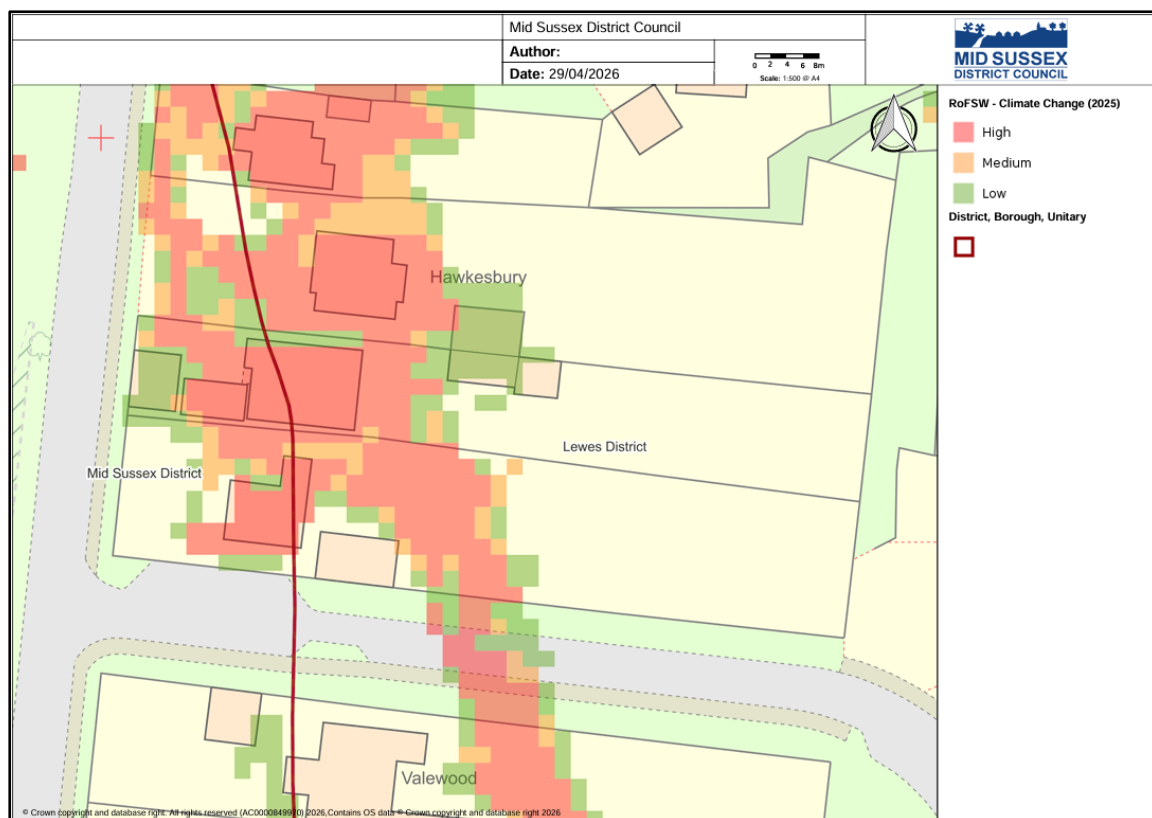


Figure 2: Risk of Flooding from Surface Water –Climate Change 2040 – 2060 (Source: EA)

The Risk of Flooding from Surface Water mapping suggests the site is shown to be at “Very Low” to “High” surface water flood risk (comparable to flood zones 1 and 3b) for the present day (2025) and to be at “Very Low” to “High” surface water flood risk (comparable to flood zones 1 and 3b) within the climate change range of 2040 – 2060.

The area of “High” surface water is associated with a flow path which crosses the site from south to north and encroaches onto the driveway.

Based on the latest guidance that all sources of flooding should be considered consistently, part of the site would be considered functional floodplain (Flood Zone 3b); it's location part within the 1:30 surface water flood extent with climate change.

The proposed driveway serves a residential development, which is classified as ‘More Vulnerable’ development in accordance with Annex 3 of the National Planning Policy Framework (NPPF). As the driveway forms part of the access serving this residential development, it is also considered to fall within this vulnerability classification.

Utilising the Flood Risk Vulnerability and Flood Zone Compatibility Table (Planning Practice Guidance, Paragraph 079 and Figure 1), ‘More Vulnerable’ development should not be permitted within Flood Zone 3b (functional floodplain).

Furthermore, the proposed driveway forms the primary and only access and egress route serving the residential properties. As part of demonstrating that development will be safe for its lifetime, the applicant must demonstrate that safe access and escape can be maintained during flood events.

The current information indicates that the access route is affected by high surface water flood risk associated with the flow path, and no information has been provided to demonstrate that safe dry access or safe egress during a flood event can be achieved.

Historical Flood Risk

Mid Sussex District Council's records do not contain records of the site flooding. Our records also contain no records of flooding within the area immediately surrounding the site.

Mid Sussex District Council's records are not complete, and flooding may have occurred which is not recorded. A site having never flooded in the past does not mean it won't flood in the future.

Sewers on Site

The Southern Water public sewer map does not show any public sewers located within the redline boundary of the site.

There may be sewers located on the site not shown on the plan which are now considered public sewers. Any drain which serves more than one property, or crosses into the site from a separate site may be considered a public sewer. Advice in relation to this situation can be found on the relevant water authority's website.

Surface Water Drainage

Information

Surface water drainage will ultimately need to be designed to meet the latest national and local planning and drainage policies and guidance. The drainage system will need to consider climate change, the allowances for which should be based on the climate change guidance from the Environment Agency at the time of detailed design.

Detailed drainage design should consider the impact a flooded outfall could have on the proposed drainage system.

The recommendation for a drainage condition to be utilised for an application does not preclude the need for updated calculations or alterations to a drainage strategy. Recommendation for a drainage condition shows that the Flood Risk and Drainage Team are of the opinion that the development has shown that, in principle, drainage could successfully be provided on the site.

Application specific comment

The BGS infiltration potential map shows the site to be in an area with low infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways is unlikely to be possible on site. To ensure the drainage hierarchy is followed this will need to be confirmed through infiltration testing on site as part of detailed drainage design.

No information has been provided regarding the proposed surface water drainage arrangements for the development, and therefore it has not been demonstrated how surface water runoff will be managed to ensure the development does not increase flood risk on site or elsewhere.

OBJECTION WORDING

The Flood Risk and Drainage Team object to application DM/25/2149 on flood risk and drainage grounds. The reasons for this objection are summarised below.

As the proposed new driveway / access is located within the Mid Sussex District Council administrative boundary, our comments relate to this element of the application only.

- The Planning Practice Guidance (PPG) for Flood Risk and Coastal Change, updated in August 2022, requires flood risk from all sources to be considered consistently with the approach used for river and tidal flooding (Paragraph 023).
- Areas located within the 1 in 30-year surface water flood extent are therefore considered comparable to Flood Zone 3b (functional floodplain).
- The proposed driveway serves a residential development, which is classified as 'More Vulnerable' development in accordance with Annex 3 of the National Planning Policy Framework (NPPF). As the driveway forms part of the access serving this residential development, it is also considered to fall within this vulnerability classification

- Utilising the Flood Risk Vulnerability and Flood Zone Compatibility Table (PPG, Paragraph 079), 'More Vulnerable' development is not compatible with Flood Zone 3b and should not be permitted on flood risk grounds.
- The proposed driveway forms the access and egress route serving the residential development, and no information has been provided to demonstrate that safe access and escape can be maintained during a flood event.
- No information has been provided regarding the proposed surface water drainage arrangements, and therefore, it has not been demonstrated how surface water runoff from the proposed access and associated hardstanding will be managed to ensure the development does not increase flood risk on site or elsewhere.

For and on behalf of the Flood Risk and Drainage Team
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