

Site: Land At Coombe Hill Road, East Grinstead, West Sussex
Prepared by: Phil Allen MCIWEM C.WEM
Approved by: Neil Jaques
Date: 16 March 2026

1.0 Introduction

1.1 This technical note has been prepared to discuss and provide the additional information that has been requested by West Sussex County Council (WSCC) as the Lead Local Flood Authority (LLFA) in their holding objection to DM/26/0073.

1.2 WSCC's specific comments are as follows:

"This is a full application therefore the level of detail submitted must be commensurate to the level to recommend approval or any conditions as appropriate.

We require further information to address the following:

- 1. The design detail and status of the drawings are not of sufficient detail or status (For Construction) for the level of application approval.*
- 2. Cross sections of any SuDS features should be provided on any final layout drawings along with clear 3 m easements annotated from any structures or watercourses and any natural directions of flow (sub dividing any catchments).*
- 3. A Construction Method statement and maintenance and management plan of sufficient detail should be included. The CMS should outline any details of work to be completed, detailed drainage drawings and any consent and reinstatement requirements Access points and any ecologically sensitive considerations should be outlines as well as protection measures for environmentally sensitive sites. The maintenance plan needs to include responsibility of maintenance, action of maintenance, frequency of maintenance and any arrangements for adoption.*

The information above may affect sizing, scale, layout and storage requirements of the development.

We are unable to recommend approval and would object until such time sufficient information is received to adequately assess flood risk

1.3 This technical note will deal with each of the three points raised by WSCC as the LLFA in turn below.

2.0 Discussion

The design detail and status of the drawings are not of sufficient detail or status (For Construction) for the level of application approval

Designer Response:

- 2.1 We have previously been asked to provide a full set of 'Construction Issue' drawings on similar applications in WSCC's authority as the LLFA. In response to those comments, we referenced the established RIBA Plan of Work, which organises the process of designing, constructing and operating building projects into eight established stages. It is the definitive model for the design and construction process of buildings and explains the expected stage outcomes, core tasks and information exchanges required at each project stage.
- 2.2 It applies to all parties involved in the design process, ensuring design work progresses in the correct sequence and remains fully coordinated. It provides an established structure for when information is developed and exchanged by all design disciplines. It is used as a coordination tool, so all parties align their work and progress together consistently. This means one discipline cannot fully advance without the corresponding inputs from

others. Therefore, detailed construction information relies on the coordinated input of all design disciplines first. No one party can offer Construction Issue drawings independently or too early in the design process.

- 2.3 The RIBA Plan of Work 2020 has been included in **Appendix A** of this Technical Note for the LLFA's reference. We have highlighted relevant text in the RIBA Plan of Work to direct the LLFA towards the key processes regarding drainage design in the concept, design and build timeline of development and construction projects.
- 2.4 Planning submission occurs at RIBA Stages 2 and 3 and detailed design takes place from Stages 4 to 5, and design is refined thereafter alongside site-based work and feedback. As such, it is unusual to provide construction issue designs on any aspect of the development until RIBA stages 4 and 5 are underway. The current project has not yet completed RIBA Stage 3. Therefore, with reference to the RIBA stages of work, its purpose, and the established outcomes each stage of work requires, it would be premature to issue full Construction Issue drainage plans at planning stage, especially because all other technical and design disciplines are all coordinated to working on RIBA Stages 2 and 3. Furthermore, detailed design of structural elements is required for detailed drainage design (due to the need to understand floor levels, slab levels, foundation design and levels, SVP locations and RWP locations, all of which effect the starting levels of drainage and materially impact the detailed drainage design). Structural design commences post-planning at RIBA Stage 4 so detailed design and accurate construction issue drawings cannot be developed at planning stage.
- 2.5 We would highlight that full details of all SuDS features and drainage components are included in the drawings (cover levels, invert levels, pipe sizes, pipe gradients, SuDS dimensions/characteristics, SuDS volumes, connectivity, hydrobrake references, topographical information, etc.) These details are mirrored and underpinned by the hydraulic modelling of the proposed drainage strategy. Therefore, we do not feel that detailed, construction issue drawings of the SuDS features are required to establish the viability of the drainage strategy. This has already been fully prepared and presented in the existing information. We wish to emphasise to the LLFA that, as designers, our primary responsibility is to our client and the viability of their development. Our drainage strategies are developed to function fully within the geo-environmental and technical constraints of the site and to be deliverable for our clients, not simply to satisfy a planning requirement - although we always ensure full compliance with all relevant regulations. With that in mind and as part of a working partnership with the LLFA, we would like to establish greater LLFA confidence in the robustness of our work, without the need for construction issue drawings to demonstrate this.
- 2.6 Therefore, we propose that detailed designs be conditioned and provided alongside detailed designs of all other development features and infrastructure provided by all technical teams, which is needed to properly develop the drainage design to a construction issue stage. This has previously been accepted by WSCC, provided additional detail in the form of sections of key drainage infrastructure is supplied to assist the LLFA in understanding the design in three dimensions and how it ties into the overall development layout. We note that the second requirement of the LLFA is for sections to be supplied, so we suggest that the supply of this information, along with what has already been provided and the consideration of the above, gives the LLFA sufficient comfort to accept the drainage design is functional and robust, and allows a conditional consent.

Cross sections of any SuDS features should be provided on any final layout drawings along with clear 3m easements annotated from any structures or watercourses and any natural directions of flow (sub dividing any catchments).

Designer Response:

- 2.7 Cross-sectional information of the SuDS has been provided in **Appendix B** of this report to provide further information to the detailed drainage information supplied in the drainage strategy plan.
- 2.8 The site is a single catchment.
- 2.9 The receiving watercourse flows from south to north and its place within the wider hydraulic network can be seen in Google Maps and other mapping products.

- 2.10 Regarding three metre easements, these have been provided on three out of four sides. As a note on this, the National Standards for SuDS require SuDS to be designed for safe operation, inspection and maintenance across their life, but do not prescribe any fixed maintenance strip width. Similarly, CIRIA C753 is explicit about designing maintenance access to inlets/outlets and areas where silt may accumulate and about enabling landscape machinery access (e.g., for grassed basins), but it does not require a continuous three metre easement around all sides; rather, it promotes the need for practical access routes/tracks and working areas sized for the machinery that is expected, with adequacy being assessed via the design and maintenance checklists. And, finally, the DCG (Appendix C, 2023 v2.3) requires that SuDS offered for adoption are maintainable with safe access, but does not mandate a three-metre strip around every side
- 2.11 With the above in mind, the maintenance access and easement to the SuDS and drainage features is suitable, adequate and in line with industry guidance and best practice.

A Construction Method statement and maintenance and management plan of sufficient detail should be included. The CMS should outline any details of work to be completed, detailed drainage drawings and any consent and reinstatement requirements Access points and any ecologically sensitive considerations should be outlines as well as protection measures for environmentally sensitive sites. The maintenance plan needs to include responsibility of maintenance, action of maintenance, frequency of maintenance and any arrangements for adoption.

Designer Response:

- 2.12 Construction Method Statements must be prepared by the construction contractor because they are the party with direct control over the means and methods of work, the personnel undertaking the tasks, and the machinery, materials and sequencing required on site. As the entity responsible for delivering the works, the contractor is best placed to identify the practical risks, select appropriate safe systems of work, and set out the detailed procedures necessary to ensure safety, quality and regulatory compliance.
- 2.13 Contractors have the competent site management, supervisors, and operatives who understand how each activity will be executed in the field. This includes knowledge of temporary works, lifting operations, excavation processes, traffic management, plant operation and specialist construction techniques. Because Method Statements must reflect the realities of site conditions and the contractor's chosen construction methodology, it is essential that the contractor - not the designer or client - documents them. With that in mind, and because construction contractors are not appointed until the end of RIBA Stage 4 and prior to Stage 5, it would be irregular to supply a Construction Method Statement at the planning stage.
- 2.14 Furthermore, Method Statements form a core component of the contractor's health and safety management system, and they form part of a Construction Contractor's legal responsibility for health and safety under CDM Regulations and numerous other Health and Safety legislations and Acts to which they must adhere and demonstrate compliance.. They communicate the planned safe approach to work and provide a basis for delivering:
- » Safe Systems of Work – ensuring that operatives follow controlled and risk-assessed procedures, aligned with the contractor's equipment, workforce competencies and supervision arrangements.
 - » Toolbox Talks – enabling supervisors to brief operatives clearly on the planned sequence of work, the hazards involved, control measures, and any changes arising from site conditions.
 - » Coordination with Risk Assessments – ensuring that residual design risks, site-specific hazards and task-specific risks are fully addressed in the working method.
 - » Training and Competence Management – ensuring that only trained and competent operatives carry out tasks, consistent with the Method Statement's requirements.

- „ Monitoring and Review – providing a benchmark against which site managers can check compliance, assess performance, and revise methods if conditions change.
- 2.15 Legal duties under health and safety legislation place responsibility for managing construction risks on the employer of the workers undertaking the activity. As the employer, the contractor must therefore define how work will be carried out safely. Preparing Construction Method Statements is a key way in which contractors discharge this responsibility, ensuring that work is planned, communicated and controlled at every stage. We should not, as designers, be involved in this process.
- 2.16 A management and maintenance plan suitable for planning has been provided in the Drainage Strategy and we would refer the LLFA to that at this time.

3.0 Summary

This technical note addresses the LLFA's comments and identifies what information is required, by whom, and at which project stage it is appropriately provided. On this basis, we expect the LPA and LLFA to apply suitably worded planning conditions to ensure the development proceeds in a safe, compliant, and legally robust manner, without requiring information prematurely or before it can reasonably be produced.

Appendix A

RIBA Stages of Work



RIBA Plan of Work 2020

Stage Boundaries:

Stages 0-4 will generally be undertaken one after the other.

Stages 4 and 5 will overlap in the **Project Programme** for most projects.

Stage 5 commences when the contractor takes possession of the site and finishes at **Practical Completion**.

Stage 6 starts with the handover of the building to the client immediately after **Practical Completion** and finishes at the end of the **Defects Liability Period**.

Stage 7 starts concurrently with Stage 6 and lasts for the life of the building.

Planning Note:

Planning Applications are generally submitted at the end of Stage 3 and should only be submitted earlier when the threshold of information required has been met. If a **Planning Application** is made during Stage 3, a mid-stage gateway should be determined and it should be clear to the project team which tasks and deliverables will be required. See **Overview** guidance.

Procurement:

The RIBA Plan of Work is procurement neutral – See **Overview** guidance for a detailed description of how each stage might be adjusted to accommodate the requirements of the **Procurement Strategy**.

ER Employer's Requirements
CP Contractor's Proposals

The RIBA Plan of Work organises the process of briefing, designing, delivering, maintaining, operating and using a building into eight stages. It is a framework for all disciplines on construction projects and should be used solely as guidance for the preparation of detailed professional services and building contracts.

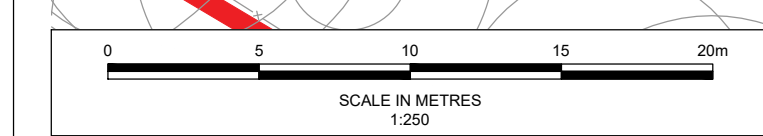
	0	1	2	3	4	5	6	7
	Strategic Definition	Preparation and Briefing	Concept Design	Spatial Coordination	Technical Design	Manufacturing and Construction	Handover	Use
	Projects span from Stage 1 to Stage 6; the outcome of Stage 0 may be the decision to initiate a project and Stage 7 covers the ongoing use of the building.							
Stage Outcome at the end of the stage	The best means of achieving the Client Requirements confirmed If the outcome determines that a building is the best means of achieving the Client Requirements , the client proceeds to Stage 1	Project Brief approved by the client and confirmed that it can be accommodated on the site	Architectural Concept approved by the client and aligned to the Project Brief The brief remains "live" during Stage 2 and is derogated in response to the Architectural Concept	Architectural and engineering information Spatially Coordinated	All design information required to manufacture and construct the project completed Stage 4 will overlap with Stage 5 on most projects	Manufacturing, construction and Commissioning completed There is no design work in Stage 5 other than responding to Site Queries	Building handed over, Aftercare initiated and Building Contract concluded	Building used, operated and maintained efficiently Stage 7 starts concurrently with Stage 6 and lasts for the life of the building
Core Tasks during the stage	Prepare Client Requirements Develop Business Case for feasible options including review of Project Risks and Project Budget Ratify option that best delivers Client Requirements Review Feedback from previous projects Undertake Site Appraisals Project Strategies might include: - Conservation (if applicable) - Cost - Fire Safety - Health and Safety - Inclusive Design - Planning - Plan for Use - Procurement - Sustainability See RIBA Plan of Work 2020 Overview for detailed guidance on Project Strategies	Prepare Project Brief including Project Outcomes and Sustainability Outcomes , Quality Aspirations and Spatial Requirements Undertake Feasibility Studies Agree Project Budget Source Site Information including Site Surveys Prepare Project Programme Prepare Project Execution Plan No design team required for Stages 0 and 1. Client advisers may be appointed to the client team to provide strategic advice and design thinking before Stage 2 commences.	Prepare Architectural Concept incorporating Strategic Engineering requirements and aligned to Cost Plan , Project Strategies and Outline Specification Agree Project Brief Derogations Undertake Design Reviews with client and Project Stakeholders Prepare stage Design Programme	Undertake Design Studies , Engineering Analysis and Cost Exercises to test Architectural Concept resulting in Spatially Coordinated design aligned to updated Cost Plan , Project Strategies and Outline Specification Initiate Change Control Procedures Prepare stage Design Programme	Develop architectural and engineering technical design Prepare and coordinate design team Building Systems information Prepare and integrate specialist subcontractor Building Systems information Prepare stage Design Programme Specialist subcontractor designs are prepared and reviewed during Stage 4	Finalise Site Logistics Manufacture Building Systems and construct building Monitor progress against Construction Programme Inspect Construction Quality Resolve Site Queries as required Undertake Commissioning of building Prepare Building Manual Building handover tasks bridge Stages 5 and 6 as set out in the Plan for Use Strategy	Hand over building in line with Plan for Use Strategy Undertake review of Project Performance Undertake seasonal Commissioning Rectify defects Complete initial Aftercare tasks including light touch Post Occupancy Evaluation	Implement Facilities Management and Asset Management Undertake Post Occupancy Evaluation of building performance in use Verify Project Outcomes including Sustainability Outcomes Adaptation of a building (at the end of its useful life) triggers a new Stage 0
Core Statutory Processes during the stage:	Strategic appraisal of Planning considerations Planning Building Regulations Health and Safety (CDM)	Source pre-application Planning Advice Initiate collation of health and safety Pre-construction Information	Obtain pre-application Planning Advice Agree route to Building Regulations compliance Option: submit outline Planning Application	Review design against Building Regulations Prepare and submit Planning Application See Planning Note for guidance on submitting a Planning Application earlier than at end of Stage 3	Submit Building Regulations Application Discharge pre-commencement Planning Conditions Prepare Construction Phase Plan Submit form F10 to HSE if applicable	Carry out Construction Phase Plan Comply with Planning Conditions related to construction	Comply with Planning Conditions as required	Comply with Planning Conditions as required
Procurement Route	Traditional Design & Build 1 Stage Design & Build 2 Stage Management Contract Construction Management Contractor-led	Appoint client team	Appoint design team	ER Appoint contractor	Tender Appoint contractor ER CP Appoint contractor Pre-contract services agreement CP Appoint contractor Preferred bidder CP Appoint contractor			Appoint Facilities Management and Asset Management teams, and strategic advisers as needed
Information Exchanges at the end of the stage	Client Requirements Business Case	Project Brief Feasibility Studies Site Information Project Budget Project Programme Procurement Strategy Responsibility Matrix Information Requirements	Project Brief Derogations Signed off Stage Report Project Strategies Outline Specification Cost Plan	Signed off Stage Report Project Strategies Updated Outline Specification Updated Cost Plan Planning Application	Manufacturing Information Construction Information Final Specifications Residual Project Strategies Building Regulations Application	Building Manual including Health and Safety File and Fire Safety Information Practical Completion certificate including Defects List Asset Information If Verified Construction Information is required, verification tasks must be defined	Feedback on Project Performance Final Certificate Feedback from light touch Post Occupancy Evaluation	Feedback from Post Occupancy Evaluation Updated Building Manual including Health and Safety File and Fire Safety Information as necessary

Appendix B

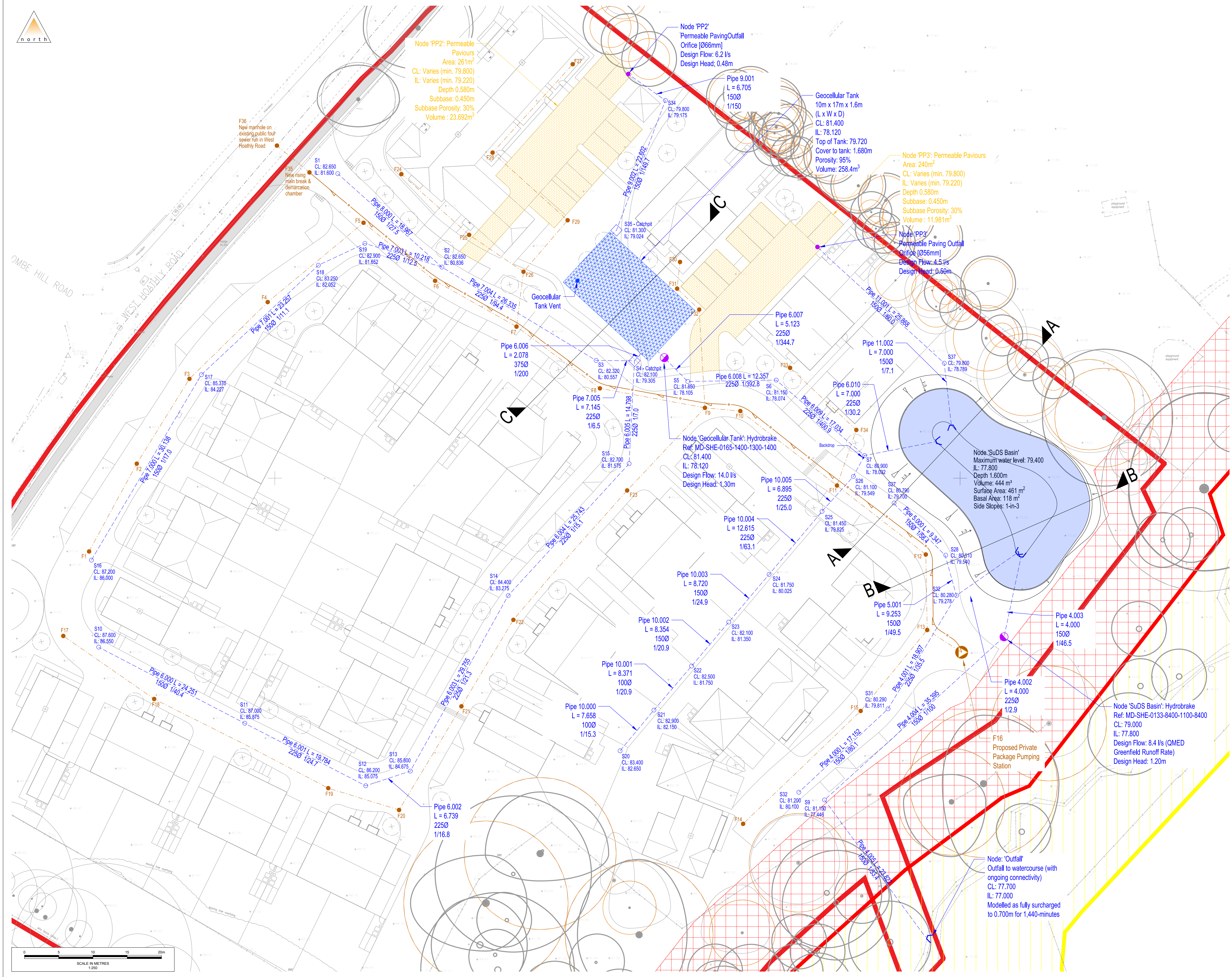
Detailed Sections and Standard Details



OMBE HILL ROAD
WEST HOATHLY ROAD



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Notes

- This Drainage Strategy Plan is for planning purposes and does not constitute detailed designs and should not be used for construction purposes.
- All levels and dimensions are to be checked on site before any work commences. All dimensions are in metres unless stated otherwise.
- This drawing has been based upon survey supplied information and Motion cannot guarantee the accuracy of the data provided.
- The drainage levels are based on existing levels, but also proposed levels where existing site features present unusual changes in gradient.
- Any discrepancies should be reported to the engineer immediately, so that clarification can be sought prior to the commencement of works.
- This drawing should be read in conjunction with all other relevant engineering details, drawings and specification.
- 350mm minimum cover is to be provided for private pipes laid in soft/paved areas, with 900mm minimum cover to be provided for private pipes laid beneath roads / driveways unless not practicable. Where unachievable, shallow pipe drains may require protection using concrete surround or paving slabs bridging the trench, subject to the HNSC Inspector's requirements.
- Manholes situated within areas accessible to motor vehicles are to be fitted with suitable strength covers and frames.
- All foul sewage to have levels confirmed once detailed design commences and slab/FFL's are finalised.

Legend

- Site Boundary
- Permeable Pavements
- Geocellular Attenuation Tank
- Surface Water Gravity Pipe
- Surface Water Manhole
- Foul Gravity Pipe
- Foul Water Manhole
- Foul rising main
- Existing foul public surface water sewer
- Orifice Flow Control
- Hydrobrake Flow Control
- Proposed Headwall
- Catchpit Manhole (1200mmØ)
- Geocellular Tank Vent
- Backdrop Manhole
- 5m Ancient Woodland Buffer
- Ancient Woodland

P06	Sections added, basin shape updated	CC	PA	PA	13/03/2026
P05	Fifth Issue - Final Site Layout	PA	PA	PA	16/12/2025
P04	Fourth Issue	PA	PA	PA	24/11/2025
P03	Third Issue - Foul Sewerage Added	PA	PA	PA	20/11/2025
P02	Second Issue	PA	PA	PA	07/11/2025
P01	First Issue	PA	PA	PA	05/08/2025
Rev.	Description	Drm	Chk	App	Date

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

Guildford - Reading - London
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Client:
Devine Homes

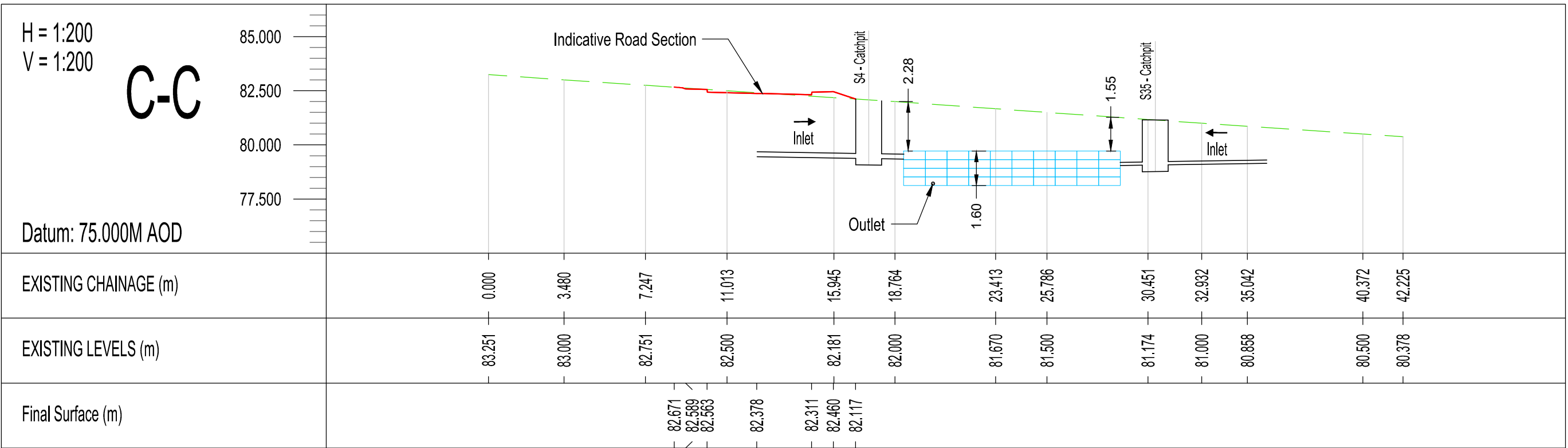
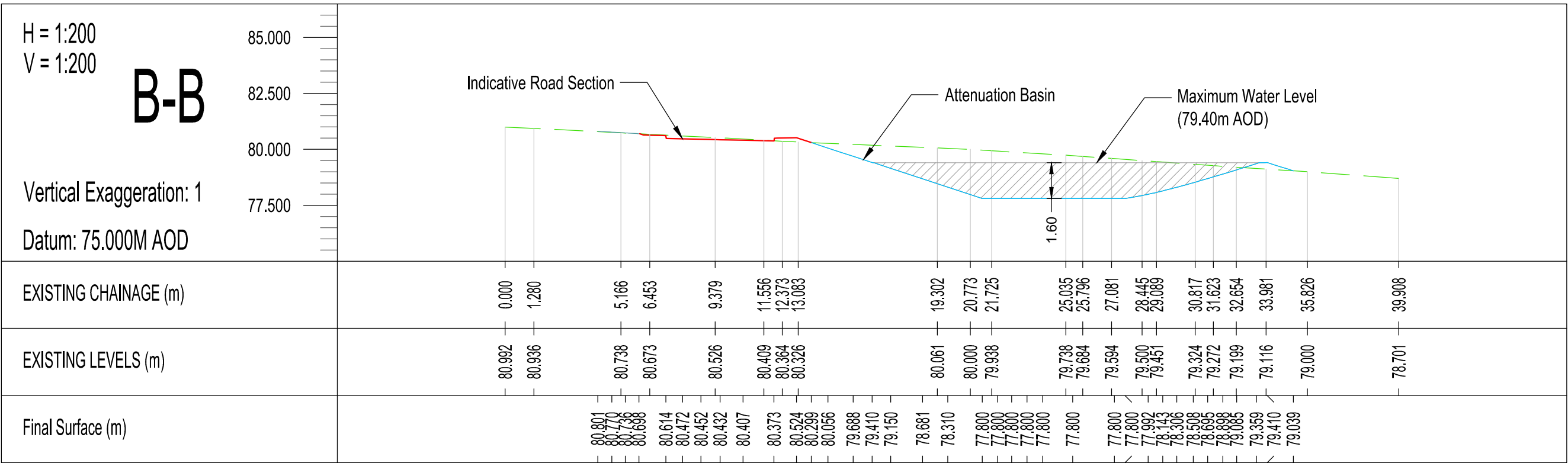
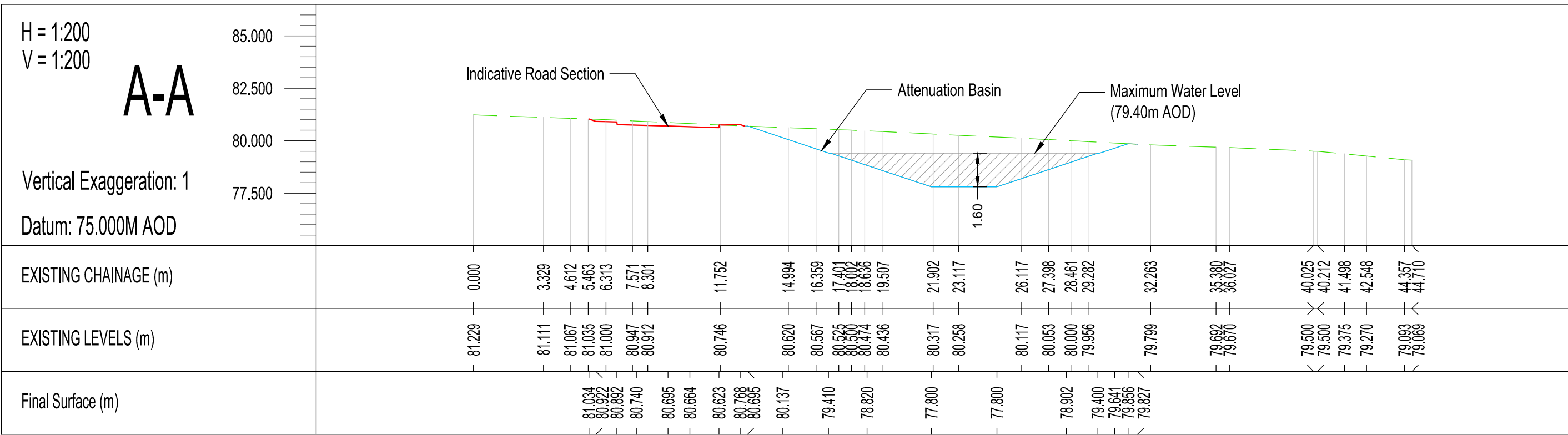
Project:
Land South of West Hoathly Road
East Grinstead, West Sussex

Title:
Drainage Strategy Plan

Scale: 1:250 (@ A1)

Drawing:
2504066-0500

Revision:
P06



- Notes
- All levels and dimensions are to be checked on site before any work commences. All dimensions are in metres unless stated otherwise.
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 - Manholes situated within areas accessible to motor vehicles are to be fitted with suitable strength covers and frames.

- Legend
- Existing Ground Surface
 - Proposed Road
 - Proposed Basin
 - Proposed Cellular Storage

P01	First Issue	CC	PA	PA	16/03/2026
Rev.	Description	Drm	Chk	App	Date

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION



Client:
Devine Homes

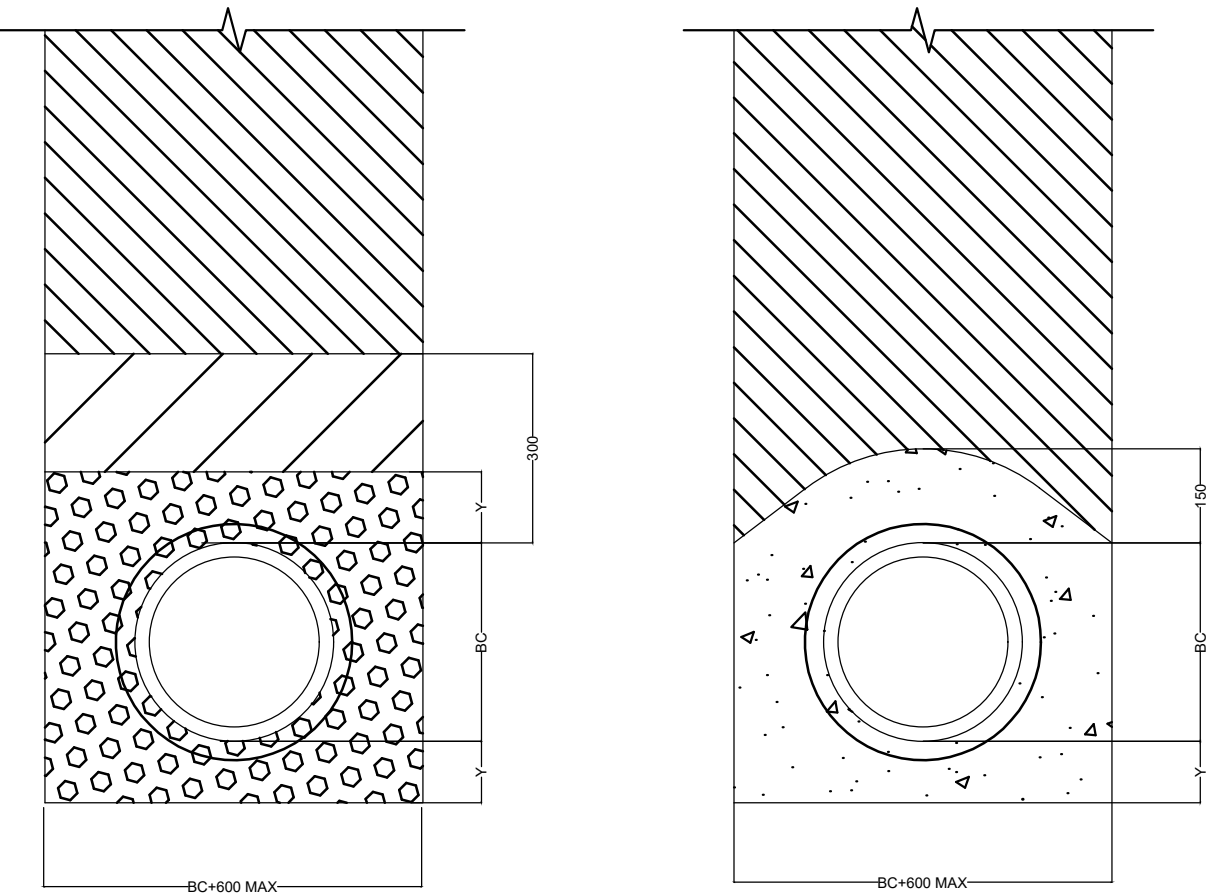
Project:
Land South of West Hoathly Road
East Grinstead, West Sussex

Title:
Drainage Strategy
Cross Sections

Scale: 1:200 (@ A1)

Drawing:
2504066-0330

Revision:
P01



GRANULAR BED
AND SURROUND
CLASS `S`

CONCRETE BED
AND SURROUND
CLASS `Z`

KEY

- SUITABLE BACKFILL MATERIAL.
- SELECTED SIDEFILL AND SURROUND.
- SINGLE SIZE GRANULAR MATERIAL.
- GEN3 CONCRETE BED AND SURROUND.

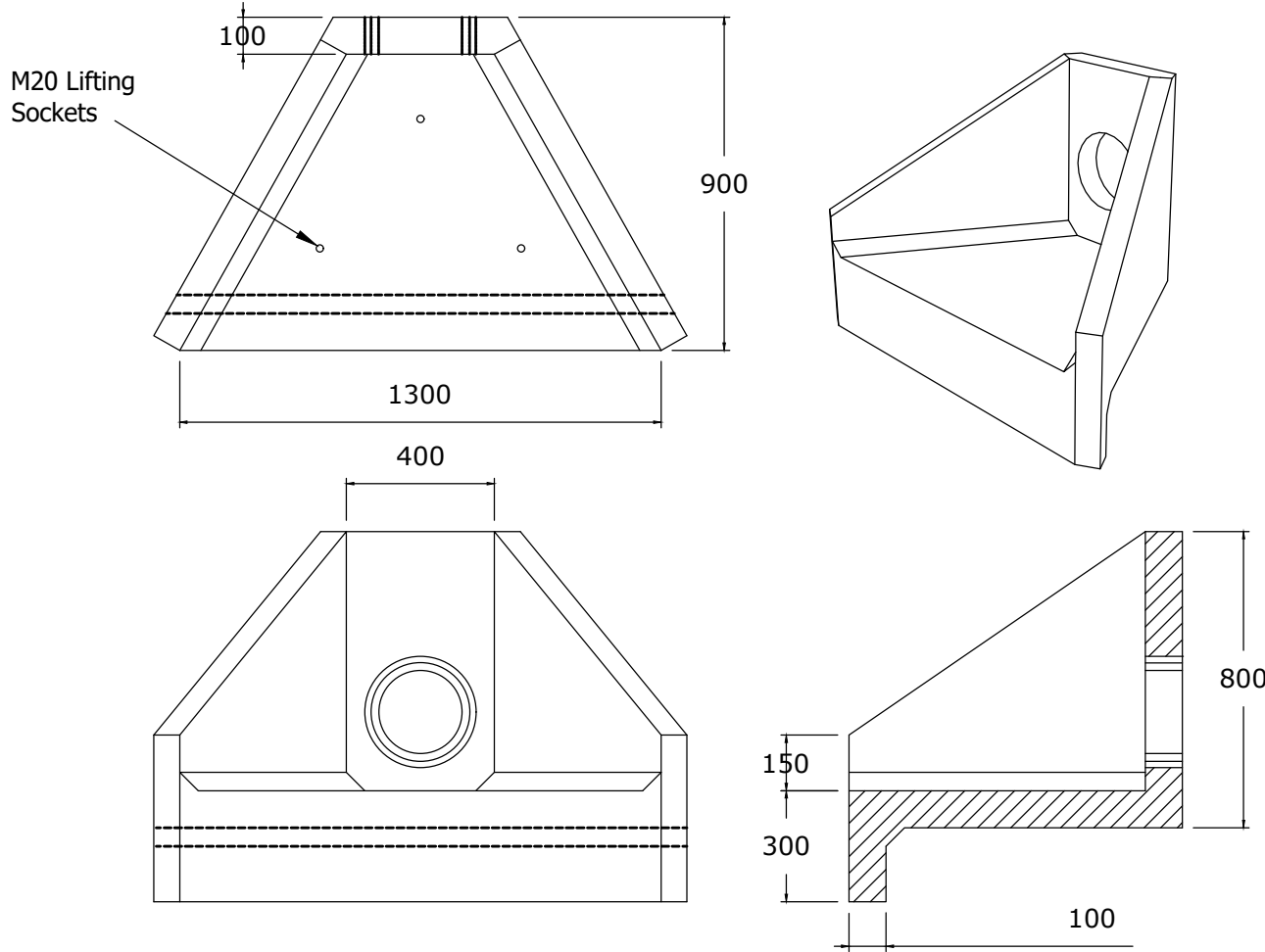
DN = NOMINAL INTERNAL DIAMETER OF PIPE.
BC = OUTSIDE DIAMETER OF PIPE.

DIMENSION Y

CLASS	MACHINE DUG UNIFORM SOIL	ROCK OR MIXED SOILS
N,F,B & S	NOTE (i)	NOTE (ii)
A & Z	NOTE (ii)	NOTE (ii)

(i) $Y=BC/6$, WITH MIN 100 UNDER BARRELS (50 FOR SLEEVE JOINTED) AND MIN 50 UNDER SOCKETS, WHICHEVER IS THE GREATER, WITH MAX OF 400.

(ii) $Y=BC/4$, WITH MIN 200 UNDER BARRELS (150 FOR SLEEVE JOINTED) AND MIN 150 UNDER SOCKETS, WHICHEVER IS THE GREATER, WITH A MAX OF 400.



Headwall Details

NOTES:

- All dimensions in mm
- All measurements ± 1 mm

Specification Information

- Opening in back wall cast to suit outside diameter of the pipework
- Invert level of pipe can be set to your specification

Headwall Installation

Units should be bedded on minimum 150mm thick well compacted Class 6A* selected well graded granular material.

*Manual of contract documents for Highway Works: Volume 1 (MCHW1) specification for Highway Works, Series 600

Sit the headwall level or with a slight fall 1:50 from pipe to spill mouth.
Material: Reinforced concrete

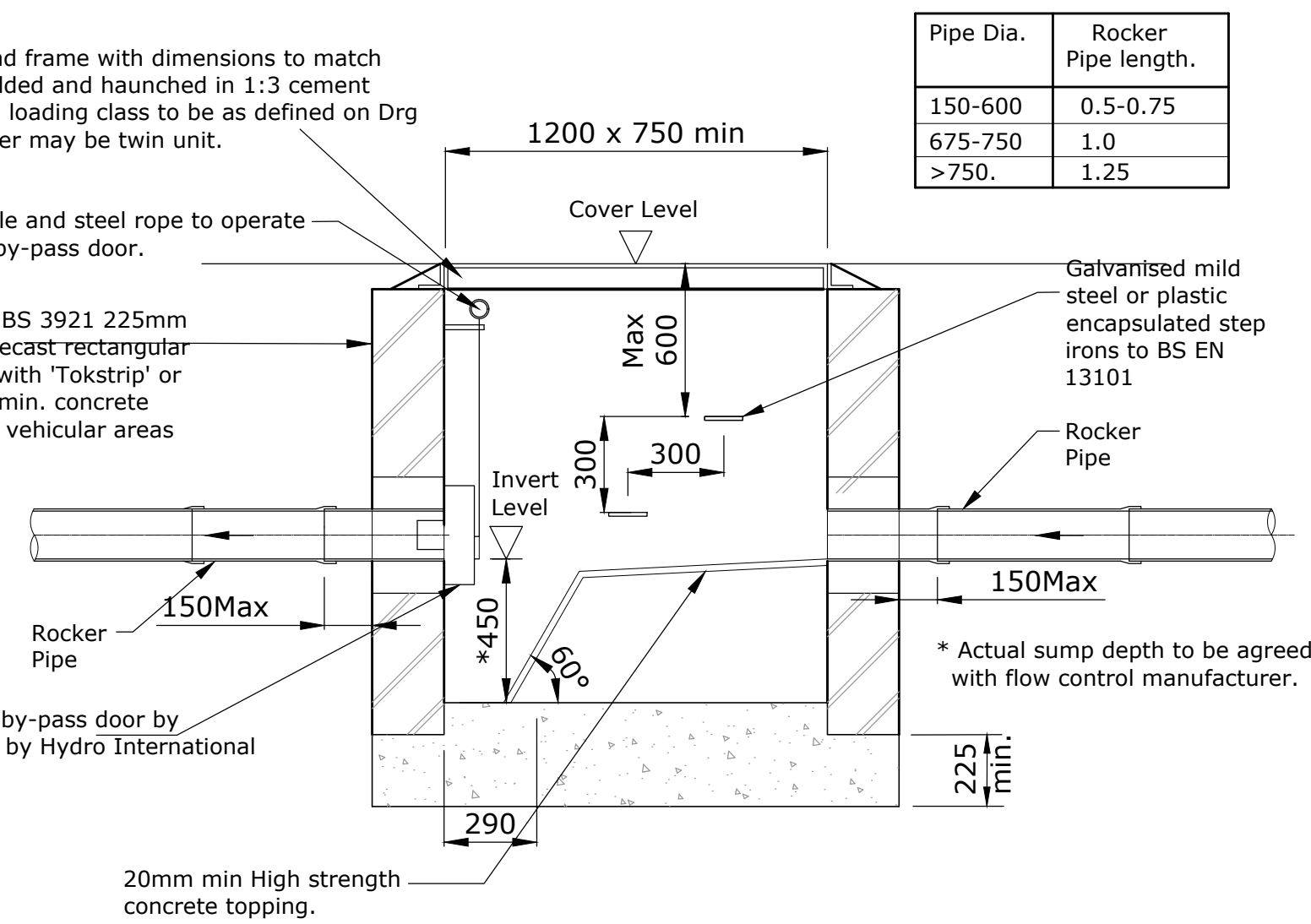
Transporting, Lifting and Installation to be in accordance with manufacturer's installation guide.

Manhole cover and frame with dimensions to match chamber size bedded and haunched in 1:3 cement mortar. Minimum loading class to be as defined on Drg 45001 Note: Cover may be twin unit.

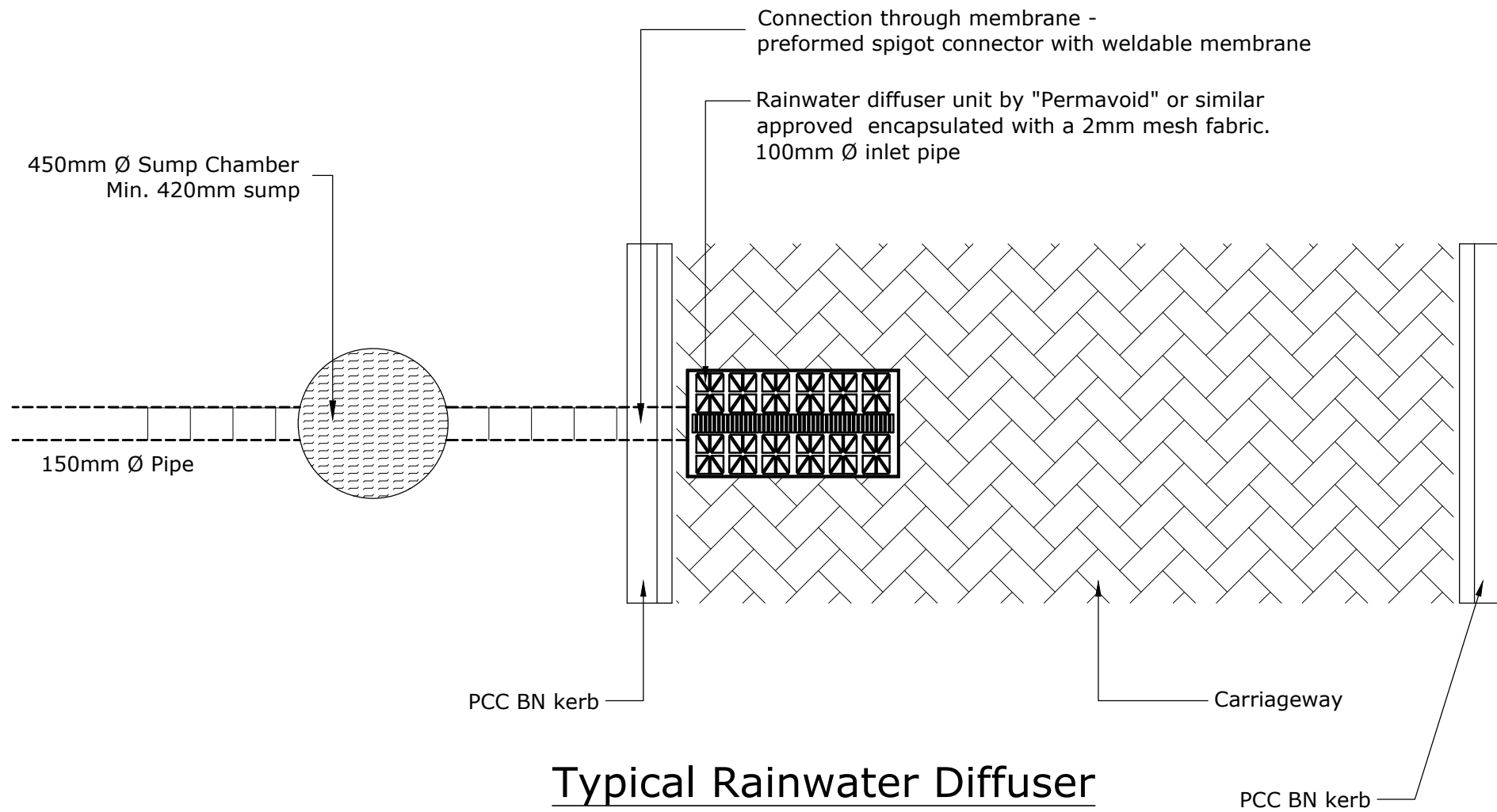
Pull handle and steel rope to operate pivoting by-pass door.

Engineering brickwork to BS 3921 225mm thick, in 1:3 mortar or precast rectangular units to BS 5911 jointed with 'Tokstrip' or similar material and 100 min. concrete surround (grade C20) for vehicular areas

Flow control with pivoting by-pass door by specialist e.g. Hydrobrake by Hydro International or equivalent approved.



Typical Flow Control Chamber



Typical Rainwater Diffuser
Pipe Connection Detail

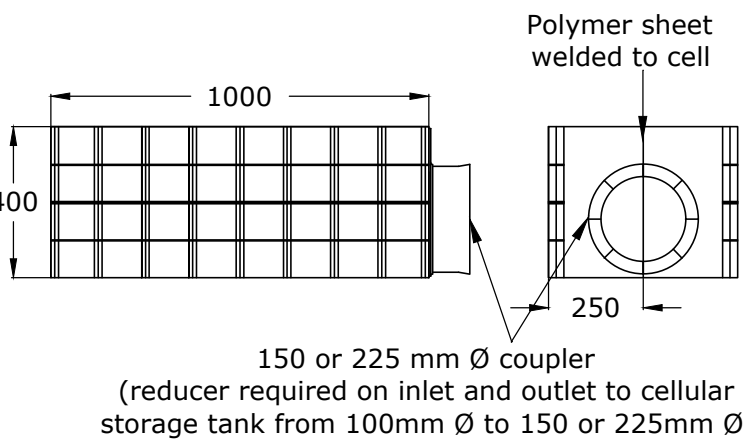


Table 1: Modular Systems - operation and maintenance requirements

Maintenance schedule	Required action	Recommended Frequency
Regular maintenance	Inspect and identify any areas that are not operating correctly. If required, take remedial action.	Monthly for 3 months, then six months
	Debris removal from catchment surface (where may cause risks to performance) ie carriageway sweeping	Monthly
	Remove sediment from pre-treatment structures ie emptying gully and catchpit sumps	Annually, or as required
Remedial actions	Repair/rehabilitation of inlets and pipework	As required
Monitoring	Inspect/check all inlets and pipework to ensure that they are in good condition and operating as designed	Annually and after large storms

Cellular Storage Notes

Construction requirements

All cellular units to be installed in accordance with the manufacturer's instructions. Local soil and groundwater conditions and shall be investigated by the contractor and discussed with the manufacturer prior to construction.

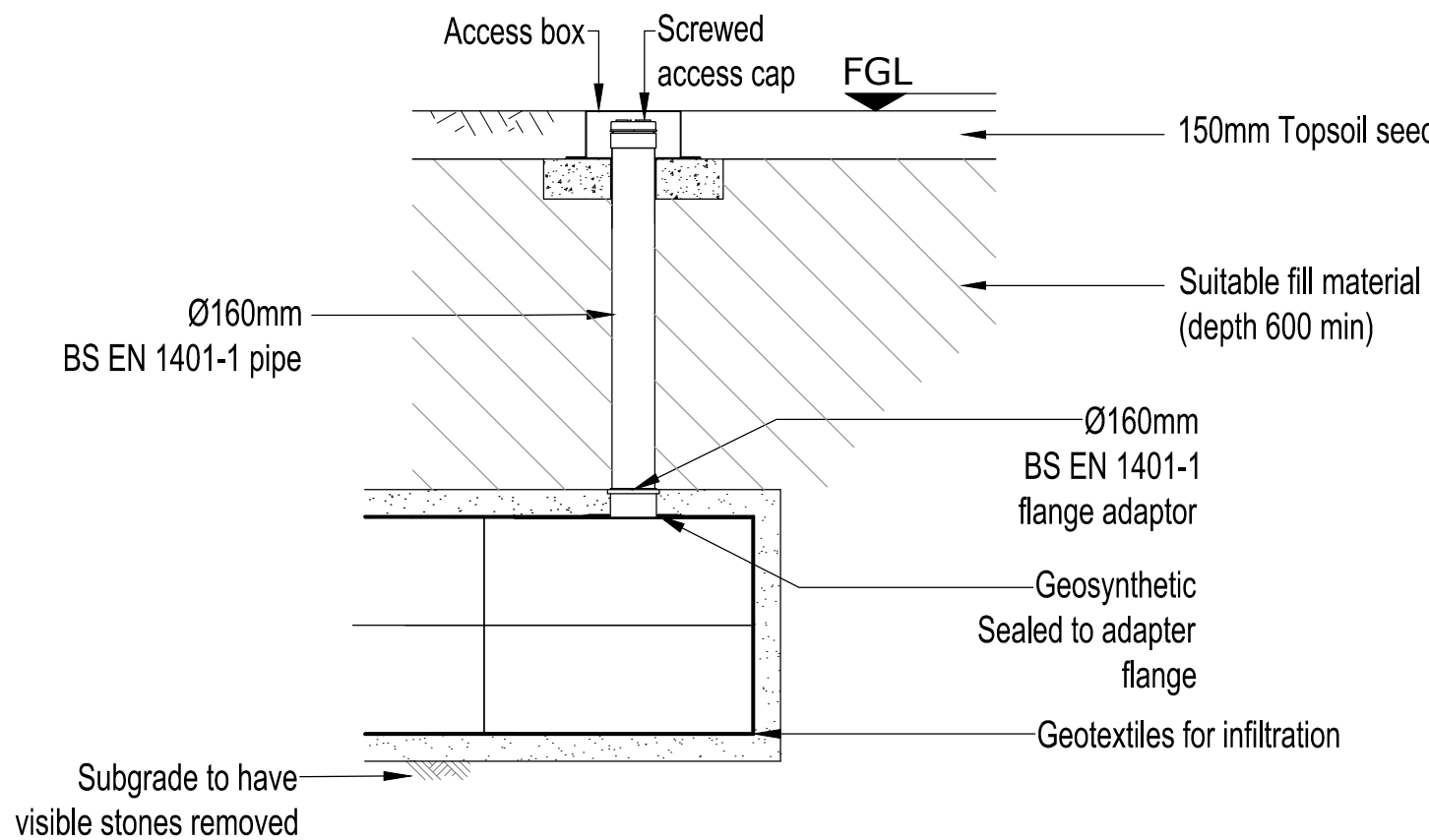
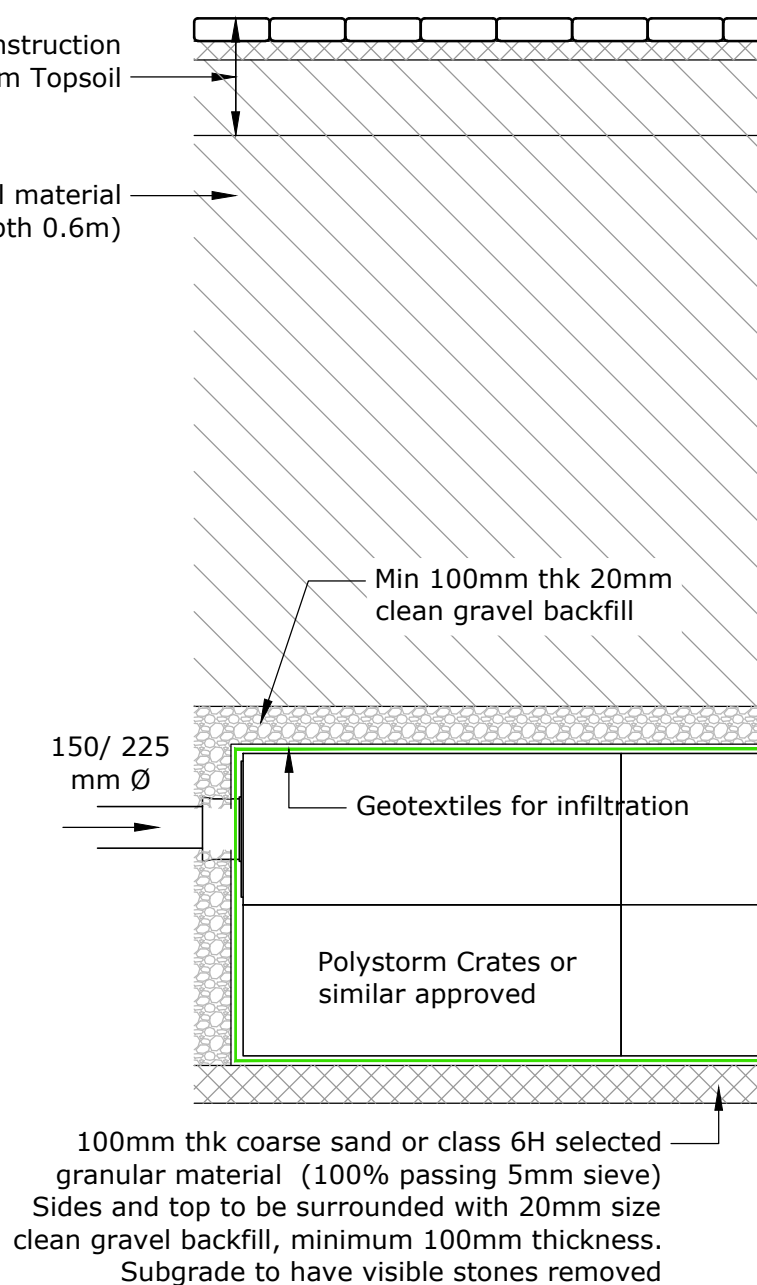
Any sediment which reaches the below ground modular soakaway system cannot be removed. The Contractor is therefore to ensure appropriate measures are taken during construction to prevent runoff from entering the units to preserve the condition of the system.

This includes the 'Construction Requirements' within CIRIA SuDS Manual 2015 Section 21.12 that prescribes procedures for handling and protection, excavation, formation preparation, placement and assembly, wrapping and backfilling. Specific manufacturer instructions provided with the units should also be followed.

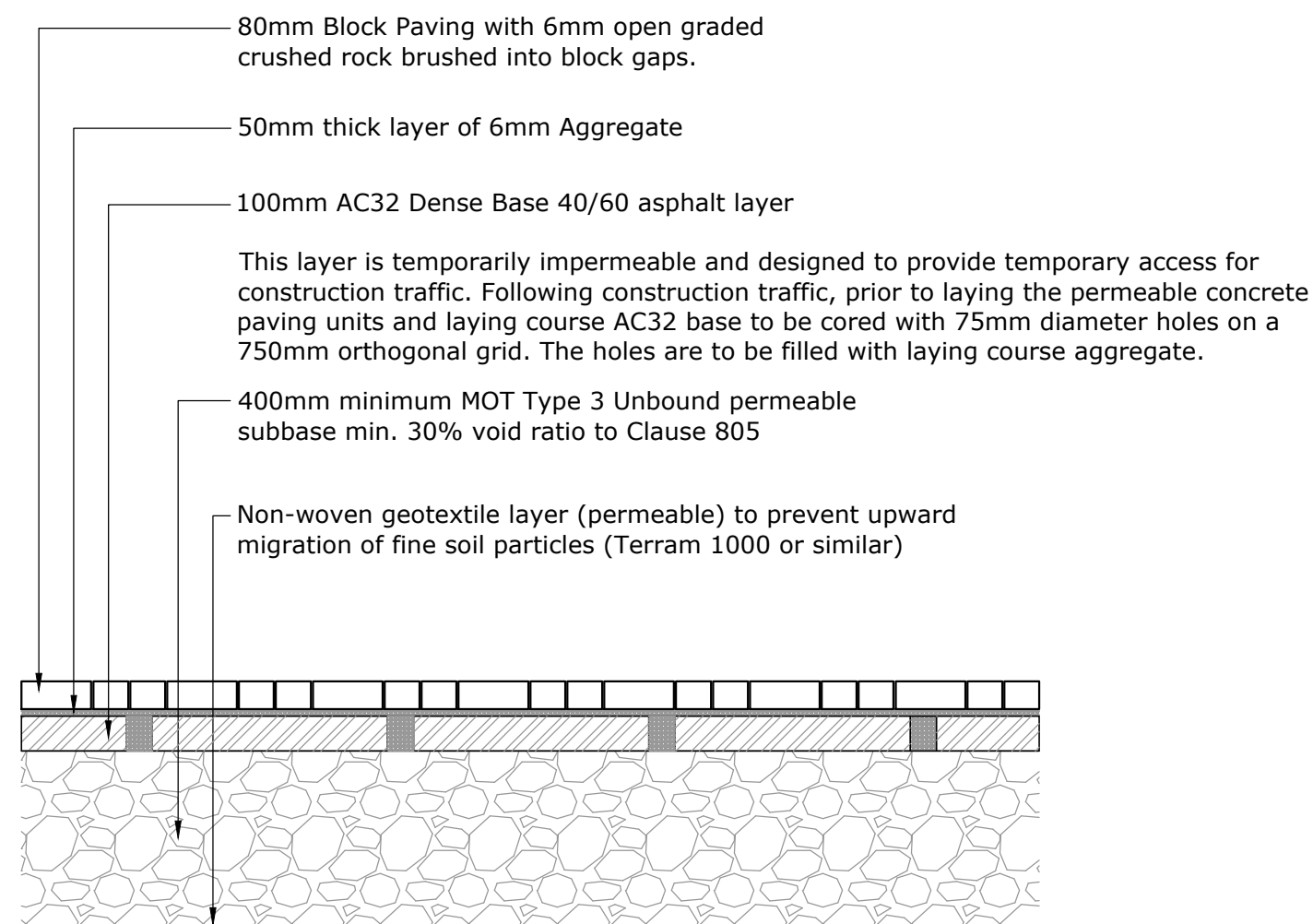
Operation and Maintenance requirements

Sediment sumps are included throughout the system including the chamber immediately upstream of the modular soakaway system. Regular inspection and maintenance should be undertaken to ensure that these are never allowed to overflow. CIRIA SuDS Manual 2015 maintenance recommendations are outlined in Table 1.

Typical Cellular Storage Detail



Ventillation System



Typical Permeable Paving Construction Detail -
Suitable for Construction traffic

P01	First Issue	CC	PA	PA	13/03/2026
Rev.	Description	Drm	Chk	App	Date

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION

motion
Guildford - Reading - London
www.motion.co.uk

Client:
Devine Homes

Project:
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Title:
Drainage Strategy
Standard Details

Scale: NTS (@ A1)

Drawing:
2504066-0800

Revision:
P01