

TECHNICAL NOTE

From	Craddys	To	LLFA
Date	May 2025	Ref	13599w0005
Subject	Response to West Sussex County Council (LLFA) comments DM/24/3077 from Mat Jackson floodriskmanagement@westsussex.gov.uk dated 13.01.25		

This technical note has been written to respond to the EA's request for information in connection with the Flood Risk Activity Permit application for the proposed Aldi food store at London Road, Amersham.

	INFORMATION REQUIRED	CRADDYS RESPONSE (CAP notes)
1	Provide updated information within an amended FRA on; ☒ Surface water flow path originating offsite ☒ Rainwater surcharged sewer flooding ☒ Historic flood information	Please refer to updated drainage strategy 13599w0002 P03 Section 3.3 (historic flooding), 3.4 (surface water flooding), and 3.6 (historic flooding), and appendix D.
2	☒ The proposal increases the risk of flooding to existing infrastructure, dwellings or property. Mitigation should be reassessed to show how flood risk can be reduced overall.	The development will actually reduce the risk of flooding elsewhere as the existing connection to the public surface water sewer will be made redundant, and all surface water generated within the site boundary will be disposed of by infiltration to the ground.
3	☒ Provide information on safe access and egress to show how the development will be safe for its lifetime. This may include assessment of how proposals will not increase the number of people living and working in areas of flood risk and if there is any additional burden placed on the emergency services. An emergency plan may also form part of this assessment (see www.adeptnet.org.uk).	We would like to reiterate that the site is located entirely within Flood Zone 1, representing a less than 0.1% annual probability of flooding from rivers or the sea. The development will therefore not increase the risk of flooding to any people over its lifetime. Please refer to updated drainage strategy 13599w0002 P03 Sections 3.2 and 3.4 regarding access and egress routes.
4	☒ Include evidence of appropriate freeboard to finished floor levels from the design flood level.	Since the site is not considered to be at risk of flooding, no design flood level is defined and a freeboard cannot be quantified.
5	☒ Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	This has now been included, please refer to updated drainage strategy 13599w0002 P03 Section 4.3 and 5.4, and appendices.
6	☒ Use up to date FEH2022 rainfall data for all design flood events.	This has now been included, please refer to updated drainage strategy 13599w0002 P03 Section 4.3 and 5.4, and appendices.
7	☒ Provide an easement of 3m from the top bank of any watercourse is required for maintenance.	As identified in Section 2.3 of the drainage strategy, the closest watercourse is approximately 450m from the site, therefore no easement is required.
8	☒ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see West Sussex LLFA website).	Similar to the above, no works on near an ordinary watercourse form part of the development.
9	☒ Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.3 and appendix E for infiltration testing and ground conditions.
10	☒ Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	The existing drainage layout is shown on the topographic survey in appendix C of the drainage strategy. All on-site surface drainage and the majority of the foul will be removed as part of the development as shown on the proposed drainage layout in appendix F.

11	☒ Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	The existing surface water discharge rate from the site is unknown, however it will be reduced to zero since run-off from the re-developed site will be disposed of to the ground via infiltration.
12	Drainage location hierarchy has not been followed, further information is required on; ☒ evidence why rainwater reuse can't be included ☒ Source control and interception has not been provided by the provision of vegetated SuDS.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.3 and appendix F for calculations regarding rainwater re-use. Although vegetated SuDS features are not included, interception of the first 5mm of rainfall is inherently met by the use of infiltration features which ensures that no water is discharged off-site.
13	☒ Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	No discharge to a watercourse is proposed, therefore no permission is required.
14	☒ Surface water sewer – no in principle agreement from owner of the asset.	No discharge to a sewer is proposed, therefore no asset owner agreement is required.
15	☒ The application must provide water quantity benefits in open, at the surface or above ground SuDS.	The quantity of water discharging from the site will be zero since water will be disposed of via infiltration. Permeable paving throughout much of the site will provide this at the surface where possible.
16	☒ The application must provide water quality benefits.	Pollution mitigation for all parts of the site have been assessed by using the Simple Index Approach. Please refer to updated drainage strategy 13599w0002 P03 Section 5.4 and appendix F.
17	☒ The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Due to the constraints of the site layout, it has not been possible to incorporate vegetated SuDS features into the proposed drainage system. However, the development will introduce more than 1000m ² of soft landscaping and more than a dozen new trees which will represent biodiversity benefits over the existing office building and car park.
18	☒ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	The development will achieve a 100% betterment over existing discharge rates since all surface water will be disposed off via infiltration to the ground.
19	☒ Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Please refer to updated drainage strategy 13599w0002 P03 Section 4.3 and 5.4, and appendices.
20	☒ Use up to date FEH2022 rainfall parameters in any modelling scenarios.	Please refer to updated drainage strategy 13599w0002 P03 Section 4.3 and 5.4, and appendices.
21	☒ Drawings need to show all the drainage features (storage and conveyance) with labels the same as those in supporting calculations.	Pipe number and soakaway references are consistent between the calculations and the drawing. Permeable paving is not included in the modelling; it has been conservatively assumed that these areas contribute to the soakaway.
22	☒ Drawings need to show the final design (but not construction issue or preliminary issue).	The proposed drainage layout drawing does show the final design, to the extent that this can be defined at this time. As acknowledged, there may be further refinements at detailed design/construction stage.
23	☒ Cross sections and long sections of all the network and structures such as ponds, basins and swales.	Pipe long sections are now included with the calculations, refer to drainage strategy appendix F. No ponds, basins, or swales are proposed.
24	Updated supporting calculations required to show; ☒ revised modelling calculations to use a CV value of 1	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.
25	☒ 50% AEP rainfall event does not surcharge in the drainage network.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.

26	☒ 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.
27	☒ 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water (e.g. pumping station or substation) within the development boundary.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.
28	☒ the appropriate climate change allowance must be included. (45%)	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.
29	☒ above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change must be shown on a drawing with proposed external ground levels and proposed finished floor levels of buildings	The soakaway has been sized such that there is no flooding anticipated in all events up to and including the 1 in 100 year event + climate change.
30	☒ above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change should be designed to be held in the least vulnerable areas of the site e.g. open space.	As above, no flooding is anticipated in this event.
31	Flood resistance and resilience must be shown to be included in the design. ☒ A minimum of 300mm must be provided between any design flood event and the finished ground floor level. ☒ A minimum of 150mm above external ground levels and show that they are sloping away from vulnerable areas such as doorways.	Since the site is not considered to be at risk of flooding, no design flood level is defined. As discussed in section 3.3 of the drainage strategy, levels will be arranged such that falls are away from the building.
32	☒ Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as highways or car parks	Please refer to updated drainage strategy 13599w0002 P03 Section 5.4, and appendix F.
33	☒ The drainage calculations must be shown to include a surcharged outfall to a watercourse or sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.	No discharge to a watercourse or sewer is proposed, therefore a surcharged outfall scenario is not relevant.
34	☒ A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse will appropriate pollution measures.	Please refer to updated drainage strategy 13599w0002 P03 Section 5.
35	☒ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	No adopted SuDS features are proposed, therefore no easements are required
36	☒ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse).	As identified in Section 2.3 of the drainage strategy, the closest watercourse is approximately 450m from the site, therefore no easement is required.