

From: Rebecca Tier <rebecca@manorwood.co.uk>
Sent: 08 July 2026 09:34:26 UTC+01:00
To: "Katherine Williams" <katherine.williams@midsussex.gov.uk>
Cc: "Ben Kirk" <ben@manorwood.co.uk>
Subject: DM/25/3028 - West House Farm Henfield Road Albourne

Good morning Katherine,

Our client's flood and drainage consultant, Motion, has provided the following the responses in red below and the additional information attached as requested by the Council's Drainage Team.

Safe Access and Egress

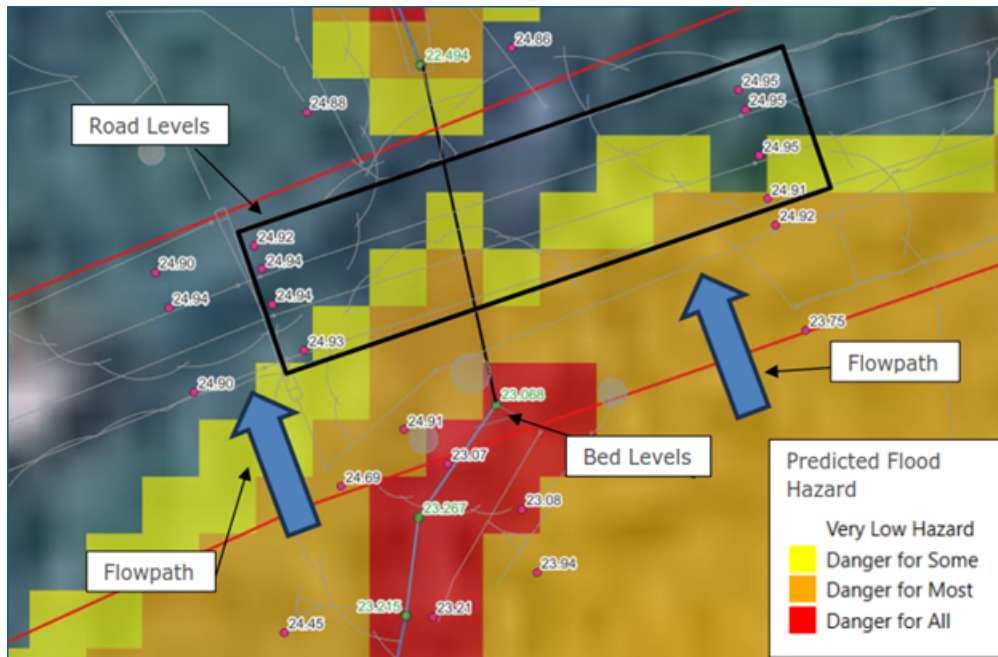
The submitted hydraulic modelling provides an assessment of flood risk associated with the culverted watercourse crossing beneath the access road. Whilst this work is welcomed, the modelling indicates flood depths of up to approximately 0.37m and identifies areas of elevated flood hazard in the vicinity of the culvert crossing.

The conclusion that the identified hazards are overstated appears to rely upon professional judgement regarding potential interpolation errors within the model. However, no revised modelling has been submitted to demonstrate the extent to which the results would change following correction of these issues.

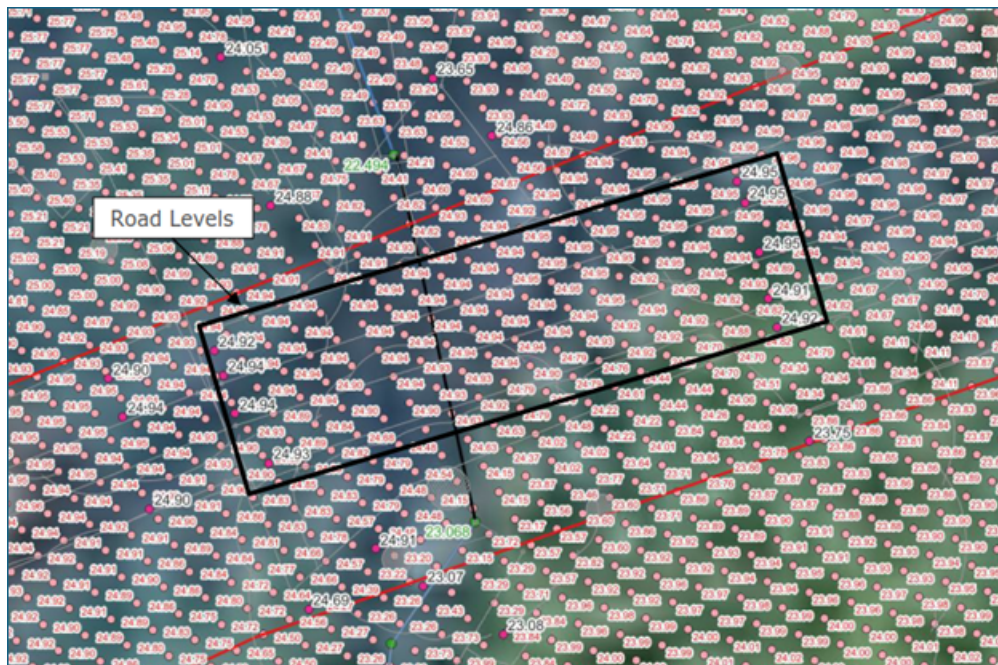
As such, it has not been conclusively demonstrated that safe access and egress can be maintained during the relevant design flood events.

Furthermore, whilst the applicant has assessed the extent of flooding and associated hazard ratings, no Flood Warning and Evacuation Plan (FWEP) or equivalent emergency response procedure has been provided. In the absence of such information, it has not been demonstrated how future occupants would be made aware of flood events, what actions would be taken during a flood event, and how safe evacuation would be achieved should access become affected by flooding.

The technical note prepared by Motion includes the results of hydraulic modelling undertaken for the culverted watercourse, with Ardent's modelling indicating that flooding would only affect a short section of the access road (approximately 25 m) during an extreme event, with shallow depths and very low risk elsewhere. Surveyed levels along the access route range from 24.91 m to 24.95 m AOD, while the adjacent watercourse bed level is 23.068 m AOD. See figure below.



However, Ardent has confirmed that the hydraulic model utilised levels between 24.63 m and 24.95 m AOD, resulting in a maximum discrepancy of 0.28 m where model levels are lower than surveyed ground levels. See figure below.



As a result, the predicted peak flood depth of 0.37 m is likely to be overestimated, with actual depths expected to be shallower, by up to 0.28 m. Comparing the hazard map with the site levels used within the Ardent model, the flood level is interpreted to extend

up to 24.94 m AOD, with levels of 24.94 m AOD and above remaining dry. **Given that the site access levels range from 24.91 m to 24.95 m AOD, most of the access route is expected to remain dry during the modelled event. Therefore, only a small section along the southern edge may be affected by very shallow flooding, with depths of approximately 0.01 – 0.03 m (10 – 30 mm).** On this basis, the modelling is considered conservative, and flood depths and associated hazard along the access route are likely to be lower than indicated, ensuring that safe and resilient access is maintained. Safe access and egress can therefore be achieved without constraint.

As requested, please find attached a FWEP for the proposed development.

Surface Water Drainage Strategy

The submitted information confirms that infiltration is unlikely to be feasible due to the underlying clay geology and proposes discharge to the existing ditch at a restricted rate of 6.0 l/s.

The applicant has calculated a greenfield runoff rate (QMED) of 1.5 l/s and a QBAR rate of 1.7 l/s. However, the proposed discharge rate of 6.0 l/s significantly exceeds the calculated greenfield runoff rates.

Whilst the proposed discharge rate represents an improvement over the existing brownfield runoff regime, insufficient justification has been provided to demonstrate why discharge at, or closer to, the calculated greenfield runoff rate cannot be achieved. The applicant has not demonstrated that a lower discharge rate has been considered, nor has evidence been provided to show that site constraints prevent further attenuation and restriction of flows.

Further justification should therefore be provided to demonstrate that the proposed discharge rate is as close as reasonably practicable to the greenfield runoff rate, in accordance with SuDS principles and local policy requirements.

The proposed drainage strategy has been updated to incorporate a complex control, attached are the revised MicroDrainage calculations and updated drainage strategy drawing. The greenfield runoff rates for each return period are provided below, and the discharge rate has been reduced to align with the corresponding greenfield rates for each return period.

Table 1.1 – Greenfield Runoff Rates

Return Period	Runoff Rate (l/s)
1 in 2	1.5
1 in 10	2.8
1 in 30	4.0
1 in 100	5.5

The results of the hydraulic modelling shows that the surface water drainage strategy can attenuate and discharge the surface water generated in the rainfall events up to the

1 in 30 year + 40% rainfall event with no flooding and in the 1 in 100-year + 45% rainfall event with negligible flooding.

Surface Water Discharge Location and Capacity

The submitted information confirms the existence of the receiving ditch and its connection to the wider watercourse network. However, insufficient evidence has been provided to demonstrate that the receiving system has adequate capacity to accommodate the proposed discharge.

Further information should be provided regarding:

- the capacity of the receiving watercourse;
- confirmation of downstream conveyance arrangements;
- proposed outfall details, including levels and discharge arrangements; and
- evidence that the proposed discharge can be accommodated without increasing flood risk elsewhere.

The proposed drainage strategy will discharge into the existing drainage ditch, which is culverted under the access road. The proposed discharge is restricted to greenfield runoff rates for all return periods, ensuring that runoff entering the receiving system replicates the pre-development scenario and does not increase the hydraulic burden downstream. The ditch forms part of an established drainage network with sufficient conveyance characteristics to accommodate these low-rate discharges. Details of the proposed outfall, including levels and discharge arrangements, will be provided at the detailed design stage. On this basis, and given the attenuated discharge regime, it is considered that the receiving watercourse has adequate capacity. The development cannot, and does not, increase flood risk either on-site or elsewhere, as the drainage mimics the existing drainage regime, the discharge is to greenfield run-off rates and additional storage volume is provided on the site, it is in fact a betterment.

Foul Drainage Strategy

We note the intention to serve the development via a package treatment plant. However, the submitted information does not adequately demonstrate that a viable foul drainage solution is achievable.

Whilst reference is made to compliance with the General Binding Rules and the potential for discharge either to ground or to a watercourse, no supporting evidence has been provided to demonstrate the feasibility of either option.

Further information should therefore be submitted, including:

- percolation testing where discharge to ground is proposed;
- confirmation of the proposed final discharge route;
- evidence that the relevant separation distances and regulatory requirements can be achieved; and
- confirmation that the proposed arrangement can operate in accordance with the General Binding Rules or, where necessary, the requirements of an Environmental Permit.

It is understood that the existing farmhouse is served by Sewage Treatment Plant or Septic Tank which connects to the network of ditches and watercourses located on the site. As there is no existing foul sewer network in close proximity to the site, in compliance with the General Binding Rules the development will need to similarly discharge to surface water or the ground. The foul drainage and discharge of treated effluent will need to comply with the General Binding Rules or a permit is required. The General Binding Rules applies to all developments and properties in England that have a small sewage discharge to surface water or the ground, and this sits outside of the planning process and is determined by the EA General Binding Rules and permitting processes. There are no reasons why an additional single dwelling will not comply with the General Binding Rules and if a permit is required this will be applied for post planning.

I hope this answers the queries raised and provides all the additional information required relating to flooding and drainage.

Kind regards,

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