

**From:** drainage <drainage@midsussex.gov.uk>  
**Sent:** 04 July 2025 15:25:03 UTC+01:00  
**To:** "Anna Tidey" <anna.tidey@midsussex.gov.uk>  
**Cc:** "drainage" <drainage@midsussex.gov.uk>  
**Subject:** 2025.07.04 Re: DM/25/0579 -Hammonds Mill\_Class Q Application - Request for further information

Dear Anna,

Thank you for reconsulting the Flood Risk and Drainage Team on the above application. We have reviewed the following submitted information:

- Flood Risk Assessment and Drainage Strategy RESPONSE to MSDC Flood Risk and Drainage Team Comments on FRA (UPDATED) - 19 June 2025

We have the following comments:

**Fluvial (River) Flood Risk**

The applicant has submitted the Environment Agency (EA) Product 4 data as part of the updated FRA. The flood model is 1D only.

Node 363 has been utilised within the report. We disagree with this approach.

In line with best practice and national guidance, a conservative approach should be followed. This requires using the in-channel model node upstream of the site (Node 365) to define flood levels. Node 365 indicates a 1 in 100-year + 35% climate change flood level of 27.86mAOD. This climate change uplift is consistent with the Environment Agency's guidance for the Adur and Ouse Management Catchment (central allowance = 37%).

Based on this data, finished floor levels (FFLs) for residential units should be set at least 600mm above the 1:100 + CC flood level due to the presence of ground floor sleeping accommodation, giving a minimum acceptable FFL of 28.46mAOD.

The proposed FFLs for Barns 1 and 2 (Dwellings 1 and 2) are set at 29.80mAOD, which provides adequate freeboard and is acceptable with respect to fluvial flood risk.

Barn 3 (Dwellings 3 and 4) proposes a finished floor level of 27.55mAOD, which does not provide sufficient freeboard above the modelled 1:100 + 35% CC flood level. We therefore object to this proposed floor level and request that the applicant revise the design to provide an FFL of at least 28.46mAOD.

The 1:100 + 35% CC flood level (27.86mAOD) must be clearly mapped onto the topographic survey, for both the site layout and the proposed safe pedestrian escape route to the north.

A plan must be provided showing the location, alignment, and level of the safe pedestrian escape route. It must be demonstrated that this route remains dry and passable during a 1:100-year + CC fluvial flood event.

It must be demonstrated that no increase in built footprint or land raising (including ramps or terraces) occurs within the 1:100-year + climate change fluvial flood extent.

It should be noted that the EA flood model only includes the EA 'Main River' – the Herring Stream, and does not model the flood risk to the site from the numerous interconnected ditches and watercourses (including the mill race, sluices, culverts and overflow streams).

### **Pluvial (Surface Water) Flood Risk**

It is unclear from the updated Flood Risk Assessment how the surface water flood level (29.15) has been derived, or what methodology has been used to interpret the EA Risk of Flooding from Surface Water (RoFSW) mapping.

In line with West Sussex Lead Local Flood Authority (LLFA) guidance, and in the absence of bespoke modelling, we consider the 1 in 1,000 year + climate change (2040–2060) surface water extent to be a proxy for the 1 in 100 + CC design flood for surface water.

The EA Risk of Flooding from Surface Water (RoFSW) mapping indicates that Barns 1 and 2 are within an area at Low Risk from Surface Water at present day—comparable to Flood Zone 2.

For the 2040–2060 epoch, Barns 1 and 2 are shown to be at Medium Risk from Surface Water Flooding, with flood depths exceeding 0.30m for the Low — (1:100 + climate change flood extent analogue).

The land immediately north and east of Barns 1 and 2 is shown to be at High Risk from Surface Water Flooding—both at present day and with climate change (between 2040 – 2060) —comparable to Flood Zone 3b.

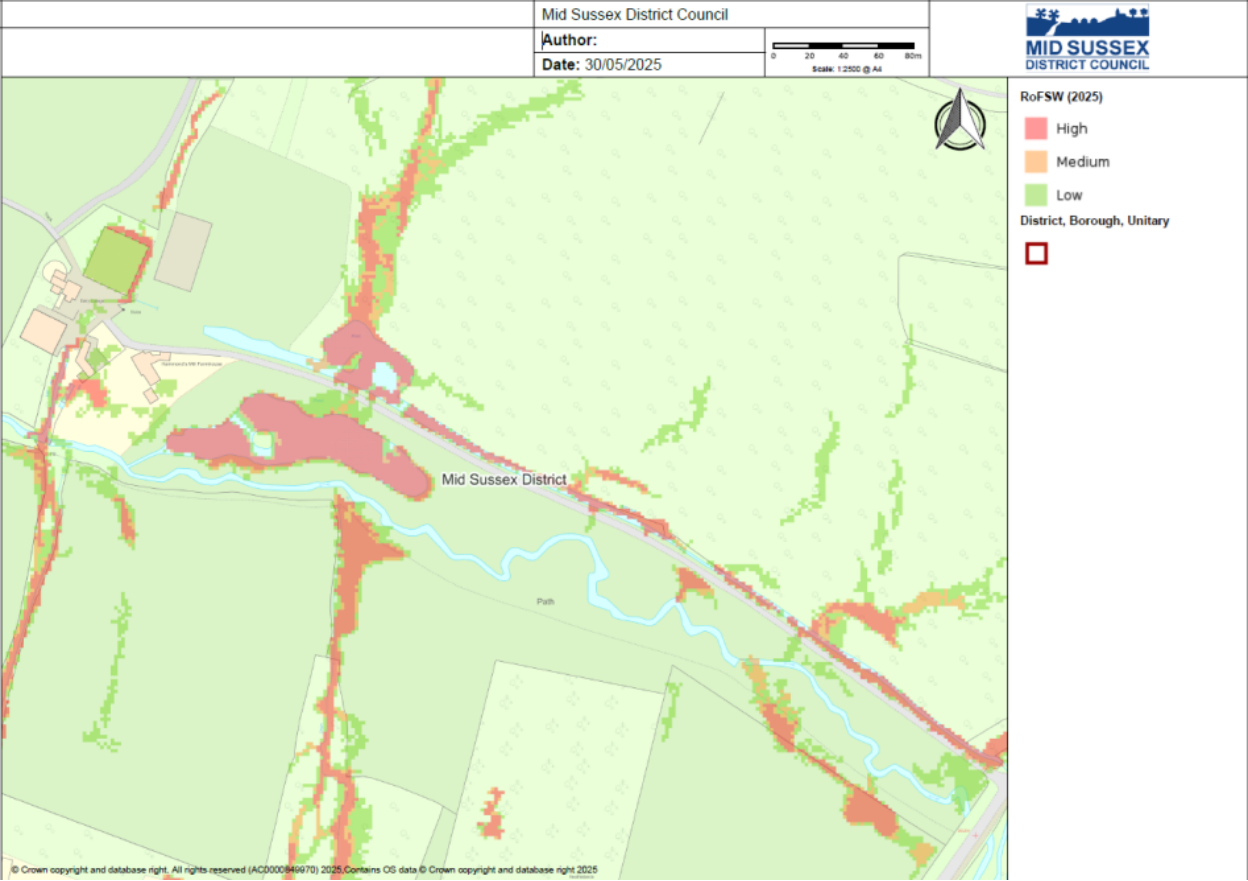
Flood depths exceeding 0.90m are shown adjacent to the north and east of Barns 1 and 2 for the Low (1:100 + climate change flood extent analogue).

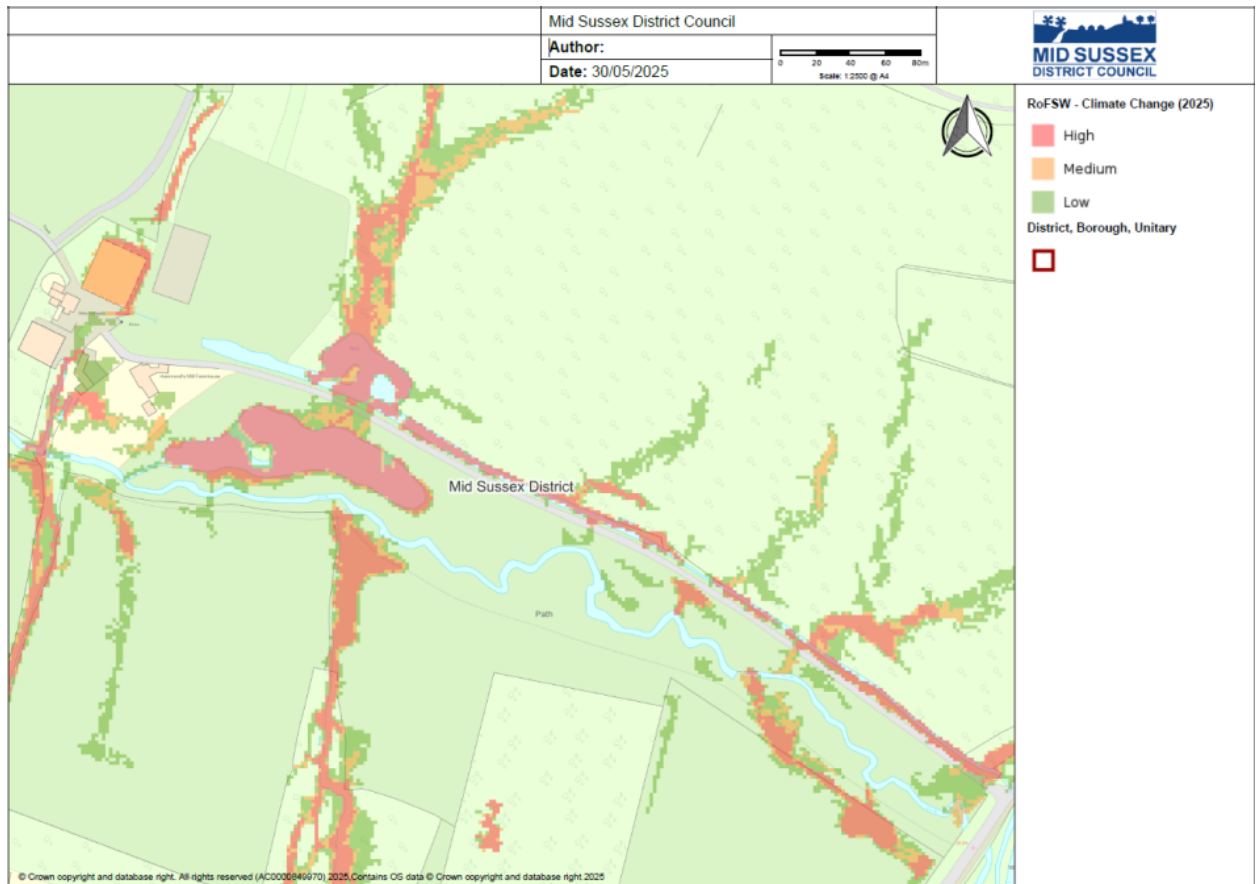
Flood depths exceeding 0.30m are shown with the footprint of Barns 1 and 2 for the Low (1:100 + climate change flood extent analogue).

Barns 1 and 2 would appear to be partially open sided, which could allow depths of 0.90m of surface water to enter the barn.

In line with the Environment Agency's Standing Advice, the applicant must demonstrate how the development will be protected from surface water flooding—this includes raising finished floor levels above the estimated surface water flood depths.

As such, the finished floor level of Barns 1 and 2 should be at least 300mm above adjacent ground level, with an additional 600mm of flood risk mitigation.





### Safe Access and Escape

In accordance with national planning guidance, including the NPPF and Planning Practice Guidance on Flood Risk and Coastal Change, all new development must demonstrate that a safe route of access and egress is available during times of flood.

For this site, the applicant must clearly identify and map a pedestrian escape route that remains safe, dry, and accessible during both the:

- 1 in 100-year plus climate change fluvial flood event, and
- 1 in 100-year plus climate change surface water flood event (typically represented by the 1:1000 year + CC RoFSW extent).

This route should connect to safe, publicly accessible land located outside of high flood risk areas (i.e., Flood Zones 2/3 or surface water flood risk zones equivalent ).

The Risk of Flooding from Surface Water mapping shows the access road/driveway to the Barns at high risk from surface water flooding during the present day and in the climate change range of 2040 – 2060.

The proposed pedestrian escape route to the north should be clearly outlined on a map / plan. It must be demonstrated that the escape route is safe for the 1:100 + climate change flood extent (surface water design flood).

Where a safe route cannot be demonstrated, additional mitigation or site layout revisions may be required. Failure to provide a suitable means of escape may render the development unacceptable in terms of flood risk to occupants.

### **Surface Water Drainage**

As per our response 30-05-2025, It is proposed that the development will utilise the existing drainage arrangements on site. The barns currently discharge surface water to a main culvert which runs below the farmyard which ultimately discharges to the overflow stream (formerly for the millpond/mill race) that runs south to join the Herrings Stream.

No further information has been provided at this stage.

### **Foul Water Drainage**

As per our response 30-05-2025, It is proposed that the development utilise a Klargestor Bio Disc sewage treatment will either use the existing effluent discharge to the Herrings Stream, or a new connection with an application under 'standard rules' for a permit.

If a shared package treatment plant is proposed which is located outside the application boundary, we would expect the applicant to provide evidence that permission has been obtained to connect to the treatment plant, that it is adequately sized to take the additional flows and a foul water maintenance and management plan which identifies responsible parties for the lifetime of the dwellings will be required for the shared system.

No further information has been provided at this stage.

### **Ordinary Watercourse Consent**

The applicant is advised that if any new development (including construction activities) is to take place within 5 metres of any drain or watercourse. It is important that Ordinary Watercourse Consent (OWC) is fully obtained before works are undertaken near this watercourse. It is important to understand that this Planning consultation deals with the flood risk impact of the proposed development, but the OWC will deal with the impact of the watercourse alteration. So, whilst the OWC is not a Planning matter, it will need to run alongside this application. Details for OWC are in the advice sections of this consultation.

OWC application: <https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/dealing-withflooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/>

### **Summary of Further Information Required**

At this time, we will require the following further information:

#### **Fluvial Flood Risk**

##### **Revised Finished Floor Level (Barn 3):**

- The proposed FFL of 27.55mAOD for Barn 3 (Dwellings 3 and 4) is not acceptable.
- The FFL must be raised to a **minimum of 28.46mAOD** to provide 600mm freeboard above the 1:100-year +35% climate change flood level (27.86mAOD at EA Node 365), in accordance with EA Standing Advice for residential development with ground floor sleeping accommodation.

#### **Flood Level Mapping:**

- The 1:100 +35% CC flood level (27.86mAOD) must be clearly mapped onto:
  - The **topographic survey of the site**, and
  - The **proposed safe pedestrian escape route to the north**.

#### **Pedestrian Escape Route Plan:**

- A **plan must be provided** clearly showing the route of safe escape during flood events, including level data, route alignment, and connection to high ground outside flood risk areas.

#### **Confirmation of No Built Footprint or Land Raising:**

- The applicant must confirm that there will be **no built footprint or land raising**, including non-floodable ramps or access paths, within the fluvial **1:100-year plus climate change extent**.

#### **Assessment of Unmodelled Watercourses:**

- As the EA model only includes the **Main River (Herring Stream)**, the applicant must assess flood risk from **all on-site and adjacent watercourses**, including:
  - The **mill race, interconnected ditches, culverts, sluices, and overflow streams**.
- Any reliance on these features for site drainage or flood management must be supported by evidence of their capacity, condition, and management.

#### **Surface Water (Pluvial) Flood Risk**

##### **Overlay of Development Layout on RoFSW Mapping:**

- The proposed layout (including all buildings, terraces, and curtilages) must be overlaid onto the **Risk of Flooding from Surface Water (RoFSW)** maps (2040–2060) to demonstrate:
  - No built development occurs within the **1:100 + climate change surface water flood extent** (treated as Flood Zone 3b equivalent).
  - No obstruction of existing flow paths.

##### **Confirmation of Finished Floor Level Strategy (Barns 1 and 2):**

- Confirm that the proposed FFLs (29.80mAOD) are:
  - At least **300mm above adjacent external ground levels**, and
  - Provide at least **600mm flood mitigation** above predicted surface water flood depths, as required by EA Standing Advice.

##### **Ingress Protection for Open-Sided Barns:**

- Provide details on how Barns 1 and 2 (partially open-sided) will be **protected from surface water ingress**, particularly where adjacent predicted depths exceed **0.90m**.

##### **Safe Escape Route – Surface Water Event:**

- Demonstrate that the pedestrian escape route to the north remains **safe and passable** in the **1:100 + CC surface water flood event**, using RoFSW (2040–2060) mapping.

#### **Foul Water Drainage**

If a **shared** package treatment plant is proposed which is located outside the application boundary, we would expect the applicant to provide evidence that permission has been obtained to connect to the treatment plant, that it is adequately sized to take the additional flows and a foul water maintenance and management plan which identifies responsible parties for the lifetime of the dwellings will be required for the shared system.

We will then be able to provide further comment once received.

Receipt of the requested additional information does not mean further information will not be requested, nor does it guarantee that the Flood Risk and Drainage Team will not object to the development. Neither does it prevent the team from recommending a flood risk or drainage condition.

Best Wishes

**Flood Risk and Drainage Team**  
**Estate Services and Building Control**  
**Mid Sussex District Council**  
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