

Planning Application Consultation Response

Application Details

Application Number	DM/25/2720
Response Date	14.11.25
Site Location	Kilnwood Apartments Rocky Lane Haywards Heath West Sussex RH16 4XL
Development Description	Proposed 6 two-bedroom apartments within a 3-storey apartment block.
Recommendation¹	No objection subject to condition Advice

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
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.

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.

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.

The Risk of Flooding from Surface Water mapping suggests the site is shown to be at very low surface water flood risk (comparable to flood zone 1) for the present day (2025) and to be at very low surface water flood risk (comparable to flood zone 1). within the climate change range of 2040 – 2060.

The PPG states that the design flood event for surface water is the 1:100 plus an allowance for climate change (Para. 002) which is the same as for river flood events.

The proposed development is a ‘more vulnerable’ development (NPPF, Annex 3).

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. Advise 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 high to moderate infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways may 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.

The application has been supported by a Drainage Strategy Briefing Note (Arden, June 2025 Ref: 196240_A-ACE-XX-00-RP-C-0001). This report states that infiltration testing was undertaken in July 2017 for the adjacent development which shows infiltration rates close to the development site to be 1.2×10^{-5} m/s. The proposed drainage strategy is based upon this infiltration rate.

We would advise the applicant that site specific infiltration testing should be utilised during the detailed drainage design to ensure accurate, up to date infiltration rates are used.

It is proposed that the development will utilise a soakaway which sits beneath the permeable paving.

The principle of the surface water drainage system is considered acceptable.

The applicant is advised that we would request that surface water drainage be designed to cater for the 1 in 100-year storm event, plus a 45% allowance for climate change, +10% urban creep, utilising a CV value of 1.0 at the detailed design stage. To ensure the drainage hierarchy is followed this will need to be confirmed through infiltration testing (BRE 365) on site as part of detailed drainage design.

The applicant is also advised that soakaways should be designed with a minimum clearance of 1m from base to water table at all times of year and must be >5m from any structure and >2m from the boundary. If soakaways are located beneath a car parking/turning area, they will need to have adequate clearance and the design will need to be suitable for the additional loading.

Information into our general requirements for detailed surface water drainage design is included within our 'General Drainage Information Guide'. This level of information will be required to address the recommended drainage condition.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required in relation to climate change etc prior to undertaking detailed design.

Foul Water Drainage

It is proposed that the development will connect to the existing public foul sewer in Rocky Lane.

Information into our general requirements for detailed foul water drainage design is included within our 'General Drainage Information Guide'. This level of information will be required to address the recommended drainage condition.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required prior to undertaking detailed design.

Condition Recommendations

C18F - Multiple dwellings/units

The development hereby permitted shall not commence unless and until details of the proposed foul and surface water drainage and means of disposal have been submitted to and approved in writing by the local planning authority. No building shall be occupied until all the approved drainage works have been carried out in accordance with the approved details. The details shall include a timetable for its implementation and a management and maintenance plan for the lifetime of the development which shall include arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. Maintenance and management during the lifetime of the development should be in accordance with the approved details.

Reason: To ensure that the proposal is satisfactorily drained and to accord with Policy DP41 of the Mid Sussex District Plan 2014 - 2031 and Policy ...'z'... of the Neighbourhood Plan.

For and on behalf of the Flood Risk and Drainage Team
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