



James Emery  
Planning & Environmental Services Department  
Lewes District Council  
Southover House  
Southover Road, Lewes  
BN7 1AB

14 October 2025

our ref: SUD/LW/25/005/R1  
your ref: LW/25/0071

Dear James Emery

**Outline planning application for the erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access).**

**Land East Of Lunce's Hill Haywards Heath East Sussex**

**Received Date: 15 September 2025**

**Position of the Lead Local Flood Authority:-**

<b>No objection</b>	The information provided is satisfactory and enables the LLFA to determine that the proposed development is capable of managing flood risk effectively.	
<b>No objection standard conditions</b>	The information provided is satisfactory and enables the LLFA to determine that the proposed development is capable of managing flood risk effectively. Although there will be a need for standard conditions which are outlined in this response.	
<b>No objection specific conditions</b>	Whilst the application documentation has not met all the County Council's requirements, it is possible that the risk is capable of being mitigated to acceptable levels by the application of planning conditions which are outlined in this response.	
<b>Objection due to Insufficient Information</b>	The applicant has failed to meet the requirements to assess its acceptability in flood risk terms. The LLFA will respond in 21 days of receipt of the requested information	<b>X</b>
<b>Objection</b>	The application presents an unacceptable on site/off site flood risk.	

## **Detailed Comments:**

Our previous consultation response dated 3 April 2025 requested the following additional information:

1. Surface water modelling and site layout and levels design which demonstrates the proposed development will be safe from surface water flood risk.
2. A Drainage Statement which contains the surface water drainage strategy supported by calculations.

We have reviewed the revised Flood Risk Assessment (dated 3 September 2025) and the Levels and Drainage Strategy (revP01).

We have also liaised with WSCC Lead Local Flood Authority, who will provide advice to Mid-Sussex District Council, to arrive at a consistent approach.

### Sequential Testing

We recommend the Council considers the need to require sequential testing in accordance with the latest NPPF and PPG requirements as there are significant portions of the developed area within surface water flood risk zones.

### Alterations to Ordinary Watercourses

A standalone plan should be provided to highlight the existing onsite and boundary ordinary watercourse and highlight any proposed alteration due to development.

One of the road crossings currently shows a new culvert with a junction, which is not acceptable. Culverting of watercourses should be as short as necessary and not include chambers or junctions.

### Surface Water Flood Risk

The proposed masterplan places development in areas of high-risk surface water flood zones and we note the proposed levels strategy raises developed area ground levels up to approximately 1 metre in the southeastern part of the site with flood water displaced from the natural floodplain.

We requested in our previous comments that the site-specific pluvial modelling files be provided with the submission in order that the model could be verified. This has not occurred and we are unable to comment on the validity of the modelling results and conclusions. We have therefore not reviewed the modelling report in detail.

It appears that in the post development situation, there are increases to flood depth within areas of attenuation basin, the modelling report should provide the resultant post development overlaid on the proposed site layout at a readable scale for clarity and ensure that no inundation of attenuation features can occur during the design storm.

The following information should be provided with the modelling report to enable review:

- Model files – Baseline and Post-development including model results and check files.
- Model log outlining changes from previous iterations.
- Levels drawing georeferenced in AutoCAD Format.
- Drawing showing outline cross sections for watercourse road crossings.

We will review the modelling report and audit the model once submitted.

## Sustainable Drainage

Despite this being an outline planning application, a relatively detailed levels and drainage design has been provided and it is clear that the size and constraints of the site for the quantum of development require the complexity of the drainage strategy proposed. However, the drainage assessment and calculations do not currently match this level of design progression and do not demonstrate the strategy is feasible.

Furthermore, the need to present a well progressed layout and levels design in order to demonstrate the mitigation for surface water flood risk, together with the level of detail of levels and drainage information currently provided at outline stage, mean that the drainage assessment will need to demonstrate feasibility of this masterplan layout at outline stage.

We therefore require the following information / clarification:

1. An assessment (or robust approximation based upon developed areas) of drained areas including urban creep allowances.
2. Greenfield runoff calculations and areas used to calculate design peak flow rates for each outlet.
3. Drainage assessment (using as a minimum source control level calculations) for each flow control, outlet and attenuation feature to assess the 1% AEP plus 45% Climate Change Allowance.
4. Assessment of effects of surcharged downstream outlet and required increase in storage to confirm size and elevation of basins with banking (or robust banking allowance offset) to tie in levels within constraints.
5. Planning stage exceedance paths should be shown on the drainage strategy plan.
6. The design should ensure there is no ingress of surface water / overland flow to the basins during the design storm for the lifespan of the development.

Please reconsult us once a further submission of information is received.

If you wish to discuss any of the points raised in this letter, please contact the case officer on [SUDS@eastsussex.gov.uk](mailto:SUDS@eastsussex.gov.uk)

Yours sincerely

  
Nick Claxton  
Team Manager - Flood Risk Management

**Case Officer:** Andy French  
**E:** [SUDS@eastsussex.gov.uk](mailto:SUDS@eastsussex.gov.uk)