

From: drainage <drainage@midsussex.gov.uk>
Sent: 10 October 2025 16:57:24 UTC+01:00
To: "Rainier, Peter" <Peter.Rainier@dmhstallard.com>
Cc: "Rachel Richardson" <Rachel.Richardson@midsussex.gov.uk>; "drainage" <drainage@midsussex.gov.uk>
Subject: 2025.10.10 RE: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA [DMHS-DMS.FID7619113]

Dear Peter,

Thank you for your email and for providing clarification in relation to the above application. The Flood Risk and Drainage Team have reviewed your comments alongside the additional information provided.

Whilst we note your points, the following clarifications are made in accordance with the National Planning Policy Framework (NPPF), Planning Practice Guidance (Flood Risk and Coastal Change), and the Mid Sussex Strategic Flood Risk Assessment (SFRA, 2024):

Flood risk vulnerability classification

Although the wider site is currently in residential use, the proposal introduces an *additional dwelling* within the curtilage and therefore constitutes *intensification of a “more vulnerable” use* under the NPPF Flood Risk Vulnerability Classification (Annex 3). Each new residential unit must therefore be assessed individually for its flood risk vulnerability, lifetime risk, and safe access/egress provisions.

Extant permission

We acknowledge that there is an extant consent for one dwelling on the site. However, any new or revised proposal must be considered against the latest Environment Agency (EA) mapping, updated flood risk data (NaFRA2, 2025) and policy changes which have occurred since your previous application. These datasets identify surface water flow paths and hazard ratings and therefore represent a material change in baseline information.

Use of Flood Zone terminology for surface water

While it is correct that the Environment Agency's *Flood Zones 1–3b* strictly refer to fluvial and tidal flooding, the Planning Practice Guidance: Flood Risk and Coastal Change was updated in August 2022 and requires all sources of flood risk “to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability” (of development). MSDC's SFRA (Policy DPS4) therefore applies the equivalent comparison (e.g., “high surface water risk = Flood Zone 3b”) for consistency in assessing development safety and Sequential Test requirements.

Depth and hazard of surface water flooding

The EA's *Risk of Flooding from Surface Water (RoFSW)* mapping shows the carriageway of Keymer Road, its immediate site frontage and the footpath which leads to Clayton Avenue within the *high-risk* surface water extent for the present-day scenario, and within the *medium to high* risk extent under the 2040–2060 climate change epoch. Even shallow fast-flowing water can result in “danger for some” to “danger for most” conditions and must therefore be assessed through a site-specific Flood Risk Assessment (FRA).

Safe access and egress

The NPPF (paragraph 167) and PPG require that residential development demonstrates a *safe route of access and escape* for the lifetime of the development (typically 100 years). Reliance on short-term “safe refuge” within the building is only appropriate where no safe access can be provided and must be justified through an FRA including flood hazard calculations and emergency management measures. At present, this information has not been submitted.

Drainage information

The BGS mapping indicates high infiltration potential; therefore, an infiltration-based surface water drainage strategy remains acceptable in principle, subject to site testing and groundwater confirmation.

While it is proposed that the development will utilise a shared soakaway, located within the new development boundary to serve both the existing and proposed dwellings.

The use of soakaways is likely to be acceptable, subject to detailed design. However, we would advise the applicant that shared drainage features should be located within areas of public realm/ shared space to help facilitate ongoing maintenance. Alternatively, individual soakaways could be utilised and located within the curtilage of the individual dwellings.

Accordingly, the previously issued recommendation for further information stands. Once an FRA and supporting drainage details are submitted that address the above points, we will be able to review the proposal further.

Best Wishes

**Flood Risk and Drainage Team
Estate Services and Building Control
Mid Sussex District Council
drainage@midsussex.gov.uk**

From: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Sent: 06 October 2025 11:28
To: drainage <drainage@midsussex.gov.uk>
Subject: FW: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA [DMHS-DMS.FID7619113]

Hi Emma,

Please can you or the drainage engineer allocated to this application reply to the email below.

Many thanks,

Rachel.

Rachel Richardson Bsc (Hons) DIP TP MRTPI

Senior Planning Officer
Development Management
www.midsussex.gov.uk
01444 477 224

Please note I work part-time (usually over Monday to Thursday) and from home Monday to Wednesday.

From: Rainier, Peter <Peter.Rainier@dmhstallard.com>
Sent: 06 October 2025 11:22
To: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Subject: RE: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA
[DMHS-DMS.FID7619113]

Hi Rachel,

Thanks for your email.

Fundamentally, the premise of your Flood Risk/Drainage team comments is that 'the proposed development would result in an increase in site vulnerability', however, there is an extant permission for the same use – a dwelling in the rear garden. Therefore, I am having difficulty understanding how the proposed development would increase vulnerability.

Could you/they clarify?

Kind regards,

Peter

Peter Rainier | Principal Director of Planning | Tel: [01293 605160](tel:01293605160) |
For and on behalf of DMH Stallard LLP
Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

All of our Gatwick teams are now based together in one office at Origin One, 108 High Street, Crawley, West Sussex. RH10 1BD.



IMPORTANT MESSAGE:

Please be aware of cyber crime. DMH Stallard LLP will NOT notify changes to our bank account details by email. If you receive any communications suggesting that the firm's bank account details have changed, you should contact the firm via the number on the firm's website or headed notepaper immediately to confirm the details before making payment. Please be aware that a phishing email may contain a fraudulent phone number for DMH Stallard LLP. DMH Stallard LLP will not take responsibility if you transfer money to a wrong account.

DMH Stallard LLP is a limited liability partnership registered in England and Wales (registered number OC338287). Its registered office is at The Portland Building, 27-28 Church Street, Brighton, East Sussex. BN1 1RB and it is authorised and regulated by the Solicitors Regulation Authority (ID. 490576). The term "partner" is used to refer to a member of DMH Stallard LLP or an employee or consultant with equivalent standing and qualifications. A list of our members, and of the non-members who are designated as partners, is open to inspection at our Brighton office. [Please click here to see our disclaimer](#)

Please don't print this email unless you really need to.



From: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Sent: Monday, October 6, 2025 10:09 AM
To: Rainier, Peter <Peter.Rainier@dmhstallard.com>
Subject: FW: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

PLEASE EXERCISE CAUTION - This message originated outside your firm.

Hi Peter,

I hope you had a good weekend.

Please see below and respond accordingly.

Kind regards,

Rachel.

Rachel Richardson Bsc (Hons) DIP TP MRTPI
Senior Planning Officer
Development Management
www.midsussex.gov.uk
01444 477 224

Please note I work part-time (usually over Monday to Thursday) and from home Monday to Wednesday.

From: drainage <drainage@midsussex.gov.uk>
Sent: 02 October 2025 17:24
To: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>; drainage <drainage@midsussex.gov.uk>
Subject: RE: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

Hi Rachel,

I have reviewed the comments – thank you. Can I check – have any plans been sent forward in response to the below:

As the proposed development would result in an increase in site vulnerability, any potential escape route from the site is shown to be at *High Risk of surface water flooding* (equivalent to Flood Zone 3b) under present-day (2025) and within the projected climate change scenario for 2040–2060

The applicant must therefore demonstrate, at this stage of planning and as part of the Flood Risk Assessment, that safe access and egress can be achieved for the lifetime of the development (taken as 100 years for residential use, in line with NPPF guidance). The plans should evidence:

- A safe route of access and escape that is set above the estimated design flood level and provides a continuous connection to an area outside of identified flood risk.

Also there are basic information's in the check list that are required. Can you ask your applicant if they have produced any of this documentation and send forward.

Upon receipt I can then pass the below forward with the further outstanding details, Any query of course drop me a call.

Best Wishes
Emma

**Flood Risk and Drainage Team
Estate Services and Building Control
Mid Sussex District Council**
drainage@midsussex.gov.uk

From: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Sent: 02 October 2025 16:29
To: drainage <drainage@midsussex.gov.uk>
Subject: FW: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

Hi Emma,

This is the response to the drainage comments for the above application.

Please forward to your engineers.

Kind regards,

Rachel.

Rachel Richardson Bsc (Hons) DIP TP MRTPI
Senior Planning Officer
Development Management
www.midsussex.gov.uk

01444 477 224

Please note I work part-time (usually over Monday to Thursday) and from home Monday to Wednesday.

From: Rainier, Peter <Peter.Rainier@dmhstallard.com>

Sent: 02 October 2025 16:17

To: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>

Cc: Malin, Lauren <Lauren.Malin@dmhstallard.com>; Da Silva, Lisa <Lisa.DaSilva@dmhstallard.com>

Subject: RE: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

Hi Rachel,

I have briefly reviewed the response from Mid Sussex (and taken advice from a drainage consultants) and note the following :

1. The vulnerability class of the site does not change – it is currently housing and remains housing and therefore is not a more vulnerable use.
2. The drainage team may be unaware (even though the planning statement sets this out) that the site already has an extant permission for a single dwelling.
3. Surface water flooding does not fall into the Flood Zone categories as it is not classified in terms of Flood Zones 1, 2, 3a or 3b.
4. Most highway and surface water sewers historically were designed for 2-year flows and checked against flooding to a 30-year event. Any flood event over 30 years is therefore likely to surcharge and potentially overtop the surface water sewers. This is the reason there is so much surface water flooding on carriageways.
5. The high risk of surface water flooding is indicated entirely within Keymer Road and for the climate change event at the highway boundaries / just outside the extent of Keymer Road on both sides for the carriageway. There is no flood levels provided, however, as the extent of flooding is indicated to the rear of footway (extent of the highway boundary) the depth of flooding can be no greater than 175mm (125mm kerb plus 50mm fall across 2m footways). This potential depth of 175mm does not prevent emergency vehicles accessing the site and the site itself remains a safe refuge.
6. There is no timescale on surface water flooding, but it is likely to be short term and therefore safe refuge within the site and emergency access through the flood water is appropriate for flood risk mitigation.

In the light of the above I hope that you and your Drainage Team will agree that no further drainage reports are required.

Kind regards,

Peter

Peter Rainier | Principal Director of Planning | Tel: 01293 605160 |

For and on behalf of DMH Stallard LLP
Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

All of our Gatwick teams are now based together in one office at Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD.



IMPORTANT MESSAGE:

Please be aware of cyber crime. DMH Stallard LLP will NOT notify changes to our bank account details by email. If you receive any communications suggesting that the firm's bank account details have changed, you should contact the firm via the number on the firm's website or headed notepaper immediately to confirm the details before making payment. Please be aware that a phishing email may contain a fraudulent phone number for DMH Stallard LLP. DMH Stallard LLP will not take responsibility if you transfer money to a wrong account.

DMH Stallard LLP is a limited liability partnership registered in England and Wales (registered number OC338287). Its registered office is at The Portland Building, 27-28 Church Street, Brighton, East Sussex, BN1 1RB and it is authorised and regulated by the Solicitors Regulation Authority (ID. 490576). The term "partner" is used to refer to a member of DMH Stallard LLP or an employee or consultant with equivalent standing and qualifications. A list of our members, and of the non-members who are designated as partners, is open to inspection at our Brighton office. [Please click here to see our disclaimer](#)

Please don't print this email unless you really need to.



From: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Sent: Wednesday, October 1, 2025 9:36 AM
To: Rainier, Peter <Peter.Rainier@dmhstallard.com>
Subject: FW: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

PLEASE EXERCISE CAUTION - This message originated outside your firm.

Morning Peter,

Please see below and address accordingly.

Kind regards,

Rachel.

Rachel Richardson Bsc (Hons) DIP TP MRTPI
Senior Planning Officer
Development Management
www.midsussex.gov.uk
01444 477 224

Please note I work part-time (usually over Monday to Thursday) and from home Monday to Wednesday.

From: drainage <drainage@midsussex.gov.uk>
Sent: 30 September 2025 09:11
To: Rachel Richardson <Rachel.Richardson@midsussex.gov.uk>
Cc: drainage <drainage@midsussex.gov.uk>
Subject: DM/25/2253 - Land To The Rear Of 2 Keymer Road Hassocks West Sussex BN6 8HA

Dear Rachel,

Thank you for consulting the Flood Risk and Drainage Team on the above application.

We understand the proposed application is for the erection of a dwelling within the rear garden of 2 Keymer Road.

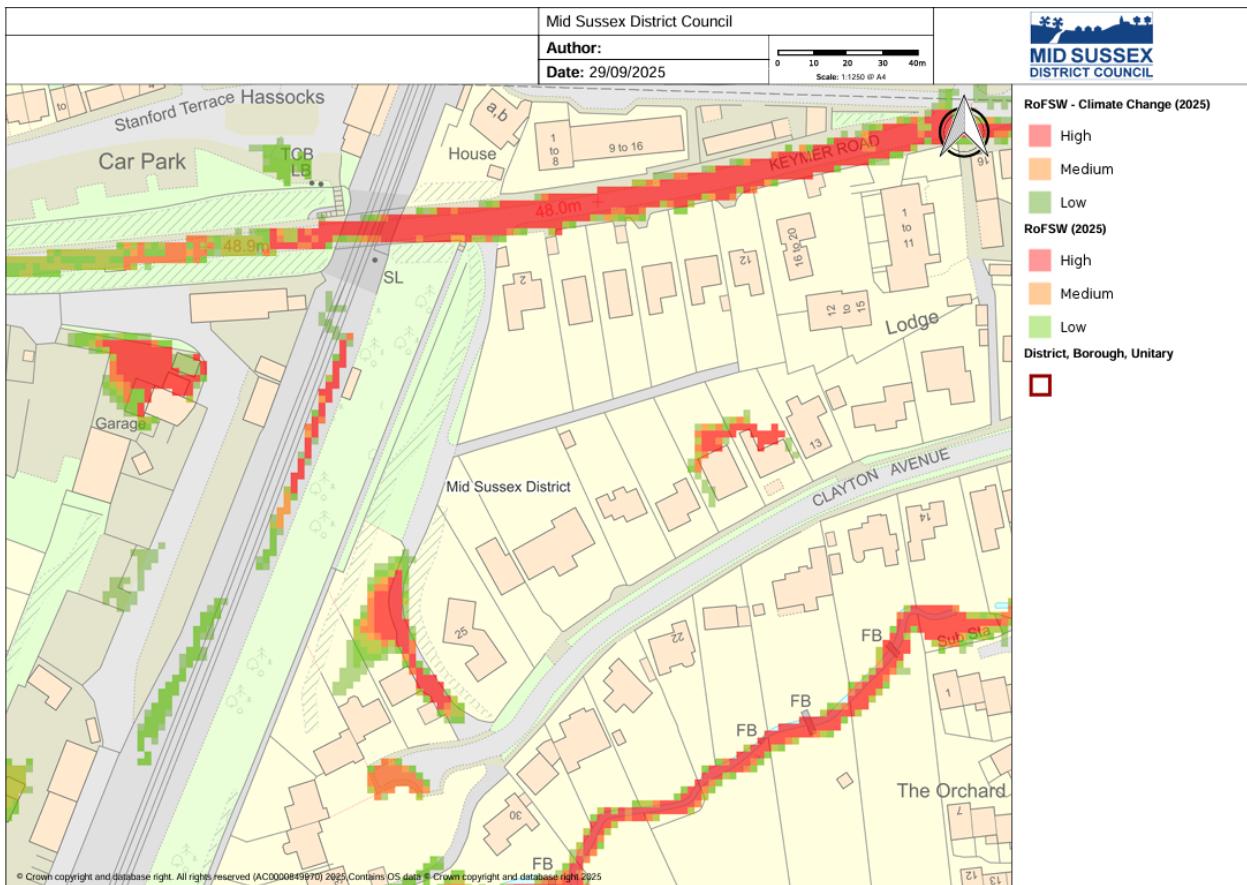
The application has gone through an initial review. The submitted information is insufficient and doesn't meet the minimum requirements as set out in the MSDC Flood Risk and Drainage Information Check List.

The applicant should refer to the MSDC Flood Risk and Drainage Information Check List (Application Stage) and the Strategic Flood Risk Assessment Map - <https://www.midsussex.gov.uk/planning-building/flood-risk-and-drainage-for-planning/>

Flood Risk

The site is in flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers).

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 within the climate change range of 2040 – 2060.



As the proposed development would result in an increase in site vulnerability, any potential escape route from the site is shown to be at *High Risk of surface water flooding* (equivalent to Flood Zone 3b) under present-day (2025) and within the projected climate change scenario for 2040–2060

The applicant must therefore demonstrate, at this stage of planning and as part of the Flood Risk Assessment, that safe access and egress can be achieved for the lifetime of the development (taken as 100 years for residential use, in line with NPPF guidance). The plans should evidence:

- A safe route of access and escape that is set above the estimated design flood level and provides a continuous connection to an area outside of identified flood risk.

Surface Water Drainage

The BGS infiltration potential map shows the site to be in an area with high infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways is likely to be possible on site.

This is considered acceptable in principle, subject to appropriate design.

We would advise the applicant that at the detailed design stage drainage must be designed to cater for the 1:100-year plus climate change event. A CV value of 1.0 should be utilised along with an urban creep allowance.

Information into our general requirements for detailed surface water drainage design is included within our 'General Drainage Information Guide'. www.midsussex.gov.uk/media/8092/detailed-drainage-design-technical-summary-version-2023-03.pdf. This level of information will be required to address the recommended drainage condition.

Foul Water Drainage

It is proposed that the development will discharge via a new connection to the public foul water sewer on Keymer Road. This is considered acceptable in principle.

Information into our general requirements for detailed surface water drainage design is included within our 'General Drainage Information Guide'. www.midsussex.gov.uk/media/8092/detailed-drainage-design-technical-summary-version-2023-03.pdf. This level of information will be required to address the recommended drainage condition.

Once the required information has been received, we will be in a position to comment further.

The applicant may need to employ the skills, knowledge and experience of a flood risk professional to guide the design of this increased vulnerability in an area of highlighted flood risk.

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
drainage@midsussex.gov.uk**

The information contained in this email may be subject to public disclosure under the Freedom of Information Act 2000. Unless the information contained in this email is legally exempt from disclosure, we cannot guarantee that we will not provide the whole or part of this email to a third party making a request for information about the subject matter of this email. This email and any attachments may contain confidential information and is intended only to be seen and used by the named addressees. If you are not the named addressee, any use, disclosure, copying, alteration or forwarding of this email and its attachments is unauthorised. If you have received this email in error please notify the sender immediately by email or by calling +44 (0) 1444 458 166 and remove this email and its attachments from your system. The views expressed within this email and any attachments are not necessarily the views or policies of Mid Sussex District Council. We have taken precautions to minimise the risk of transmitting software viruses, but we advise you to carry out your own virus checks before accessing this email and any attachments. Except where required by law, we shall not be responsible for any damage, loss or

liability of any kind suffered in connection with this email and any attachments, or which may result from reliance on the contents of this email and any attachments.

The information contained in this email may be subject to public disclosure under the Freedom of Information Act 2000. Unless the information contained in this email is legally exempt from disclosure, we cannot guarantee that we will not provide the whole or part of this email to a third party making a request for information about the subject matter of this email. This email and any attachments may contain confidential information and is intended only to be seen and used by the named addressees. If you are not the named addressee, any use, disclosure, copying, alteration or forwarding of this email and its attachments is unauthorised. If you have received this email in error please notify the sender immediately by email or by calling +44 (0) 1444 458 166 and remove this email and its attachments from your system. The views expressed within this email and any attachments are not necessarily the views or policies of Mid Sussex District Council. We have taken precautions to minimise the risk of transmitting software viruses, but we advise you to carry out your own virus checks before accessing this email and any attachments. Except where required by law, we shall not be responsible for any damage, loss or liability of any kind suffered in connection with this email and any attachments, or which may result from reliance on the contents of this email and any attachments.