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**Lead Local Flood Authority
Ground Floor
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West Sussex
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Date 23 December 2025

Planning Reference: **DM/25/3067**

Site Address: **Land West Of Kings Business Centre Reeds Lane Sayers
Common West Sussex**

Planning Description: **Erection of 80 new residential dwellings (Use Class C3), including affordable housing units, vehicular, pedestrian and cycle access (including new footpath links to the east and west of the site along Reeds Lane), landscaping and open space, parking, sustainable drainage and other related works.**

Statutory Response Due by: **26 December 2025**

Dear Stuart

Thank you for your consultation on the above site, received on 05 December 2025. For this consultation, we have reviewed the following documents submitted:

- Report: Flood Risk Assessment and Drainage Strategy | Prepared by Motion, Dated 27 November 2025 | Ref: 1rdsay 2406076

The LLFA has reviewed the information submitted in relation to flood risk at the site and the proposed surface water drainage strategy. The site is at low risk of fluvial flooding but there is known surface water flood risk to the west and north east of the site. The FRA has provided existing surface water flood depths at the site and therefore determines that the risk is low to the majority of the site. Further information on the extent of this surface water flood risk is required as it is unclear how this may impact the proposed development. The LLFA needs to be shown that the existing risk will not interact with any proposed dwellings and will not overwhelm the proposed drainage strategy. Details on the FFLs of the site to ensure they are 300mm above the design flood level should also be provided.

The LLFA understand that infiltration is not viable at the site due to the underlying geology and the high groundwater levels and therefore discharge to the existing watercourse is proposed. The LLFA has no objection to the principles of the drainage strategy and the use of source control and open SuDS features is appreciated however, further details are required on the proposed drainage strategy. The proposed attenuation basin has slope gradients of 1 in 3 which is acceptable but

no details on the gradients of the proposed swales has been provided. The hydraulic calculations use the correct parameters, but they should be updated to include half drain times of the attenuation features and calculations showing a surcharged outfall should also be provided.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- the development not complying with NPPF, PPG or local policies>

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

1. A surface water flood extent map overlain on the proposed development should be provided to ensure the dwellings and attenuation basin are outside of this risk.
2. Details of the FFLs of the proposed buildings is required.
3. Confirmation of the slope gradients for the proposed swales should be provided.
4. Details on the condition of the existing watercourse and evidence of the wider connectivity should be provided to ensure its suitability for connection.
5. The hydraulic calculation should be updated to include half drain times and a surcharged outfall.

Informative:

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex Lead Local Flood Authority. It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to the 1st April 2023. This includes those applications that are currently at an advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 and therefore, use in rainfall simulations are not accepted.

Yours sincerely

Flood Risk Management Team