

Planning Application Consultation Response

Application Details

Application Number	DM/25/0579
Response Date	2025-05-30
Site Location	Hammonds Mill Farm London Road Hassocks West Sussex BN6 9NB
Development Description	Proposed conversion of four agricultural barns to four residential dwellings.
Recommendation¹	Objection

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 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 site is in flood zone 1 and is at low fluvial flood risk (risk of flooding from Main Rivers). The south east corner of Barn 3 abuts Flood Zone 3 and its at high fluvial flood risk. No EA flood levels have been provided within the Flood Risk Assessment by DJH 06 May 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.

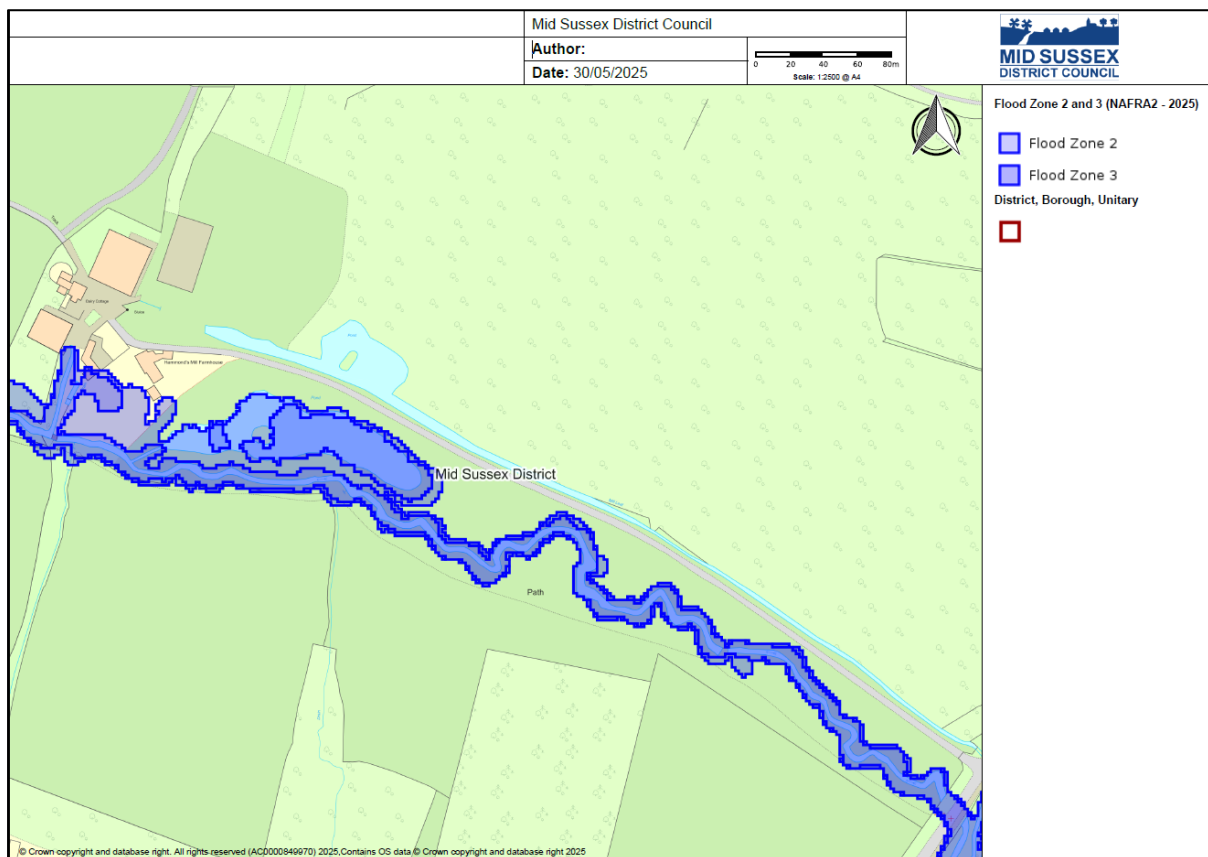


Figure 1: Flood Map for planning (source: EA)

The Environment Agency released the updated Risk of Flooding from Surface Water (RoFSW) mapping on January 28, 2025.

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 to high surface water flood risk (comparable to flood zones 1 – 3b) for the present day (2025) and to be at very low to high surface water flood risk (comparable to flood zone 1 – 3b) within the climate change range of 2040 – 2060.

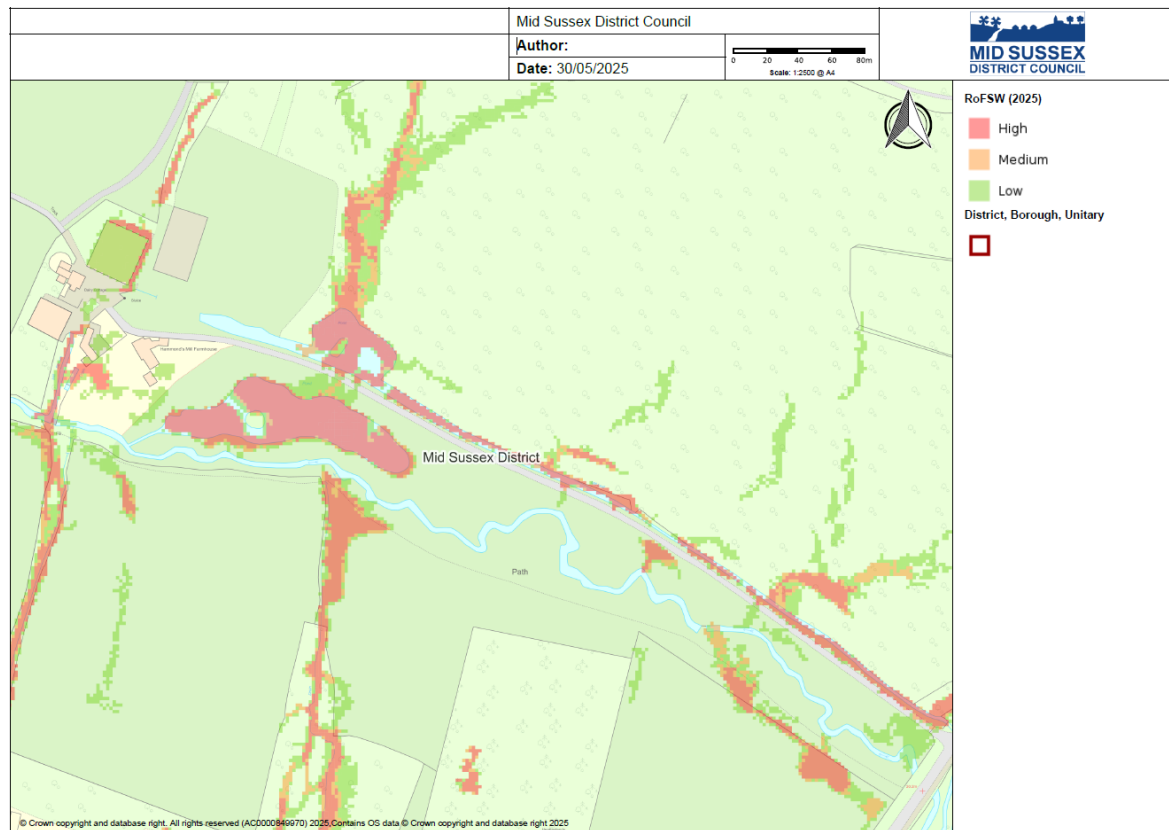


Figure 2: Risk of Flooding from Surface Water present day 2025 (Source: EA)

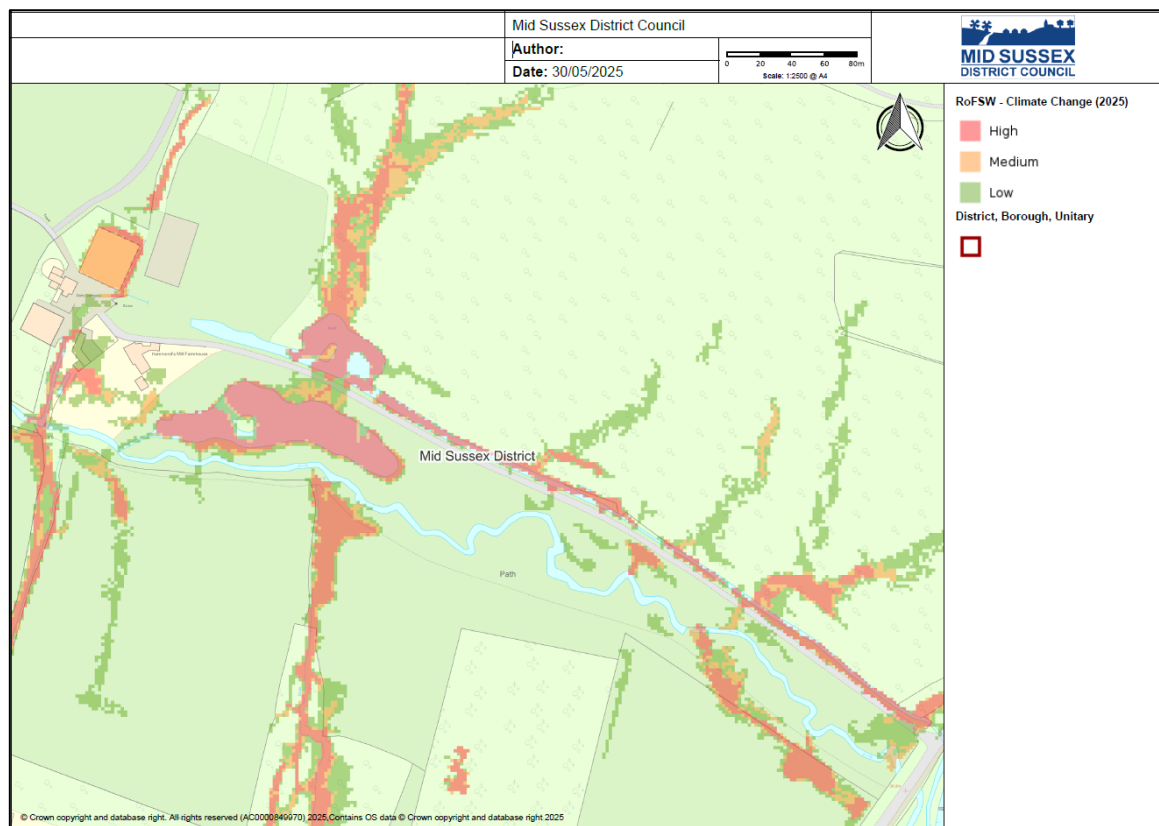


Figure 3: Risk of Flooding from Surface Water –Climate Change 2040 – 2060 (Source: EA)

The northern and eastern edge of Barn 1 & 2 are located within an area at high risk of surface water for the present day (2025) and in the climate change range of 2040 – 2060 from an active flow path originating from the north of the site.

Barns 1 and 2 are at medium risk of surface water flooding in the climate change range of 2040 – 2060.

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

Finished Floor Levels

MSDC applies the Environment Agency's standing advice sets out specific finished floor level requirements. For residential development, finished floor levels must be elevated above the design flood level (1:100+CC) and incorporate an additional margin of safety (freeboard) to address uncertainties in flood analysis. A 300mm freeboard is considered adequate, while sleeping accommodation necessitates a 600mm buffer. The designed flood level applies to both fluvial and surface water at the site.

The internal layout of the building should adhere to the Sequential Approach, prioritising the placement of sleeping quarters on higher floors whenever feasible, as opposed to solely raising ground floor levels.

Application specific comment

The Flood Risk Assessment (DJH 06 May 2025) states Finished Floor Levels (FFLs) of the proposed development (all Barns) will be set 250mm above existing barn floor levels. As such, development should not be permitted as the FFLs should be set a minimum of 300mm

above the design flood level (1:100+CC) inline with the Environment Agency's standing advice to ensure the residential development is safe for its lifetime of at least 100 years.

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.

In line with West Sussex Lead Local Flood Authority guidance, unless bespoke modelling is provided, we consider the 1:1,000 year (low) surface water flood extent to represent the 1:100 + climate change flood extent (surface water design flood).

If FFL are unable to be raised, extra flood resistance and resilience measures should be provided.

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. Advice in relation to this situation can be found on the relevant water authority's website.

Safe Access

The PPG states that when assessing the safety implications of flood risk for development proposed, the following should be considered:

- the characteristics of a possible flood event, including residual risks from flood risk management infrastructure e.g. the type and source of flooding and frequency, depth, velocity, speed of onset and duration;
- the safety of people within a building if it floods and also the safety of people around a building and in adjacent areas, including people who are less mobile or who have a physical impairment. This includes the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood (0.1% annual probability of flooding with allowance for climate change);
- the structural safety of buildings: and
- the impact of a flood on the essential services provided to or from a development.

Flood Hazard Rating

The 'flood hazard rating' is used to quantify the safety of access and egress to and from a development. The Defra document 'Supplementary Note on Flood Hazard Ratings and Thresholds for Development Planning and Control Purpose' sets out the methodology for planning purposes.

When considering the availability of safe access, the PPG states that this includes the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an “extreme flood” (0.1% annual probability of flooding with allowance for climate change). Consideration should be made for all sources of flooding, and the effects of climate change for the lifetime of the development.

The PPG states that access and escape routes need to be designed to be functional for changing circumstances over the lifetime of the development. Specifically:

- Access routes should allow occupants to safely access and exit their dwellings in design flood conditions. Vehicular access to allow the emergency services to safely reach the development during design flood conditions will also normally be required in addition to the requirements of the building regulations.
- Wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen hazards and contaminants in floodwater, or the risk that people remaining may require medical attention).

Application specific comment

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 Flood Risk and Drainage Team objects to the proposed development on the grounds that insufficient evidence has been provided that safe access and egress can be provided. The applicant has not demonstrated how the development would be safely accessed during a design flood event (1 in 100-year flood plus climate change allowance, or 1:100+CC). Furthermore, no evidence has been submitted to confirm how safe evacuation could be achieved during an extreme flood event (1 in 1,000-year flood plus climate change allowance, or 1:1,000+CC) for the entire lifetime of the development.

As a result, the proposal fails to meet the requirements of the National Planning Policy Framework (NPPF) and associated technical guidance in relation safe access and egress.

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 low infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways is unlikely to 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.

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.

Foul Water Drainage

It is proposed that the development utilise a Klargester 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.

For and on behalf of the Flood Risk and Drainage Team
Mid Sussex District Council
Telephone: 01444 477577 Option 3
drainage@midsussex.gov.uk