

## Planning Application Consultation Response

### Application Details

|                             |                                                                                                                                                                                                                           |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Application Number          | DM/24/2622                                                                                                                                                                                                                |
| Response Date               | 2025-07-03                                                                                                                                                                                                                |
| Site Location               | Barns Court Turners Hill Road Crawley Down West Sussex RH10 4HQ                                                                                                                                                           |
| Development Description     | Approval of reserved matters relating to application DM/20/4127 for Access, Appearance, Landscaping, Layout and Scale for Phase 1b comprising of Building M, a double unit workshop, ancillary Building N and yard space. |
| Recommendation <sup>1</sup> | <b>Further information required Advice</b>                                                                                                                                                                                |

Thank you for consulting the Flood Risk and Drainage Team on the above application. A Flood Risk Assessment and Drainage Report (HDR Consulting, V1 04/04/2025) accompanied the application which focuses on Phase 1B Barns Court, Copthorne.

It is understood that the site itself is part of a wider development. The development has now been split into different phases, Phase 1A, Phase 1B and Phase 2. This part of the site is called Phase 1B which was formerly a part of Phase 2.

### 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

<sup>1</sup> 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 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.

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.

The Risk of Flooding from Surface Water mapping suggests the site is shown to be at very low to medium surface water flood risk (comparable to flood zones 1 and 2) for the present day (2025) and to be at very low to high surface water flood risk (comparable to flood zones 1 and 3b) within the climate change range of 2040 – 2060.

There would appear to be two principle flow paths across the site for surface water, along the ditch present on site, and part of a surface water flow path that crosses the northern half of the site from east to west.

Based on the latest guidance that all sources of flooding should be considered consistently, part of the site would be considered to be partially within the functional floodplain (Flood Zone 3b); it's location part within the 1:30 surface water flood extent with climate change.

Utilising the 'Flood risk vulnerability and flood zone 'incompatibility' table (PPG, Para. 079 and Figure 1) less vulnerable development should not be permitted in Flood Zone 3b.

It has not been demonstrated that there will be no increase in built footprint or introduction of additional “less vulnerable” development within Flood Zone 3b.

It has not been demonstrated that there will be no increase in built footprint or land raising within the surface water 1:100 year plus climate change extent. The applicant needs to provide evidence that the proposed development will not increase flood risk on site or elsewhere. There should be no increase in built footprint or land raising within the 1 in 100 year plus climate change extent. The 1:1000 year plus climate change (2040-2060) extent is a

conservative estimate of the impacts of climate change on the 1:100 year event under the Environment Agency's recommended allowances.

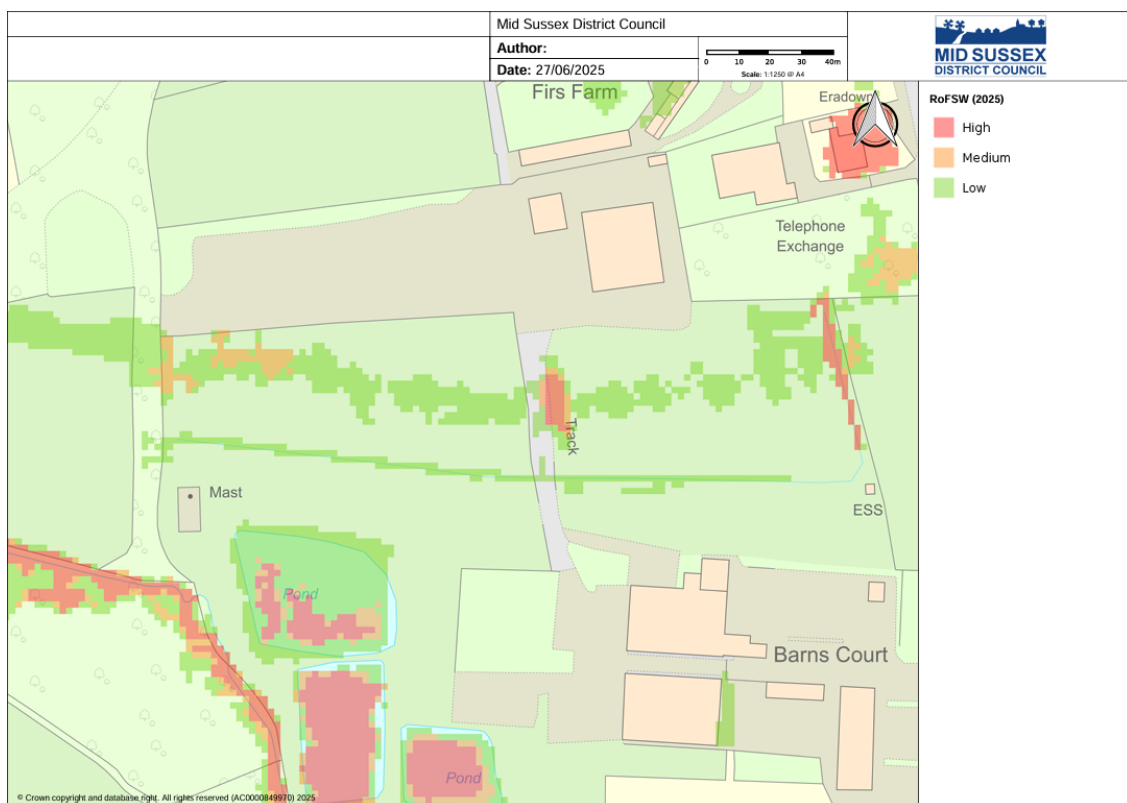
The applicant has not overlain the proposed built footprint on site onto the EA's surface water mapping, and as such it has not been demonstrated that there is no increase in built footprint within Flood Zone 3b or within the surface water 1:100 year plus climate change extent.

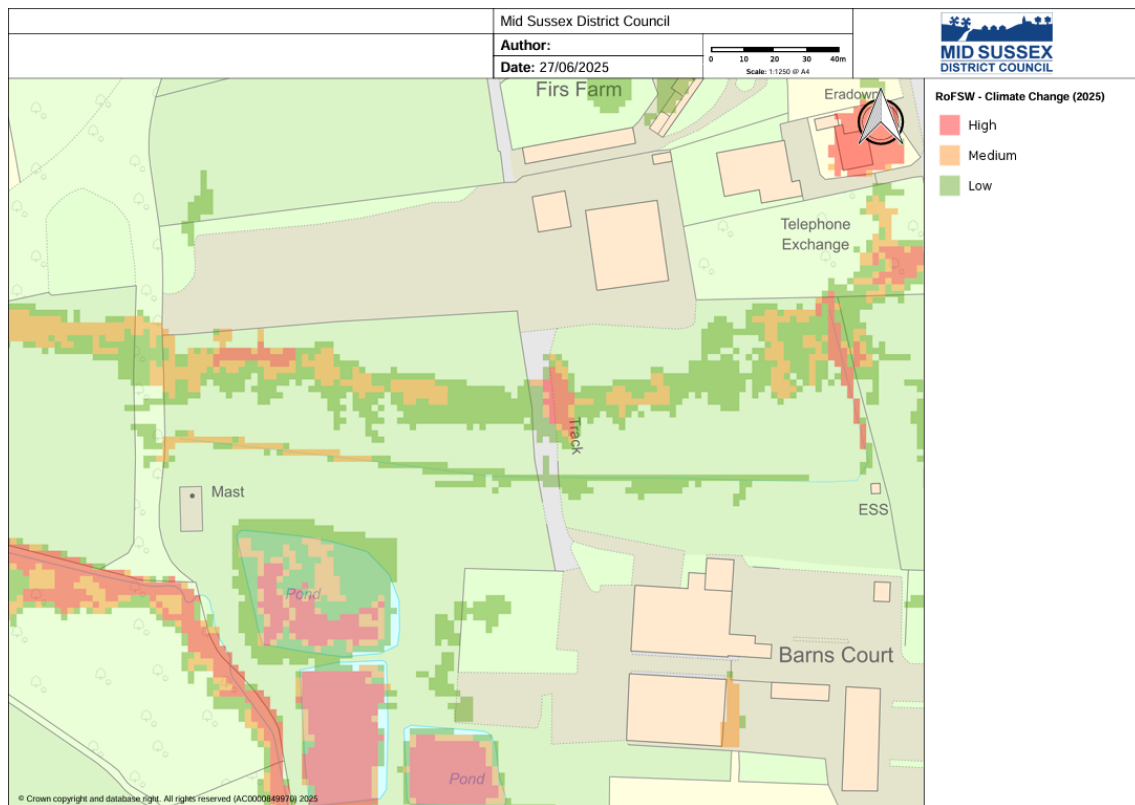
The applicant should also demonstrate the onward connectivity of the ditch on site, and how surface water flow across the site will be managed with the absence of the ditch.

The flow route across the site from east to west forms part of the wider areas natural surface water drainage. Existing surface water flow routes should be maintained post development.

If following development these natural flow routes would be blocked, then alternative routes should be provided. Failure to provide appropriate flow routes for surface water from off site will increase flood risk both on and off site.

However, the proposed site plan (Drawing: Proposed Phase 1b HGV Setting Out | Number: 206 | Date: 21/11/24) indicates open storage yards on either side of the road (no build footprint). These storage yards need to remain open so as not to impede surface water flows and not to increase flood risk elsewhere.





The proposed site plan (Drawing: Proposed Phase 1b HGV Setting Out | Number: 206 | Date: 21/11/24) also shows an existing ditch as being removed. Any removal of ditches would require Ordinary Watercourse Consent. We would advise the applicant that no ditches should be removed as part of the development and it would be very unlikely that Ordinary Watercourse Consent would be granted for this. It is important to understand that this Planning consultation deals with the flood risk impact of the proposed development, but the OWC will deal with the impact of the watercourse alteration. So, whilst the OWC is not a Planning matter it will need to run alongside this application. Details for OWC are in the advice sections of this consultation.

OWC application: <https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/dealing-withflooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/>

The applicant is advised that evidence will need to be provided at the Condition Discharge stage that Ordinary Watercourse Consent has been obtained from West Sussex County Council.

### 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

A Thames Water public sewer map shows a public foul water sewer located within the redline boundary of the site. The sewer crossed the site from the southeast to the northwest.

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.

## 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, with allowances based on the Environment Agency's climate change guidance 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*

It is understood from the Environment Agency's consultation response (in relation to the previous outline application DM/20/4127 which this site formed part of) that infiltration drainage should not be used due to the potential risk of contamination. The Flood Risk and Drainage Team advised that no infiltration drainage should be used on the site and all buried attenuation should be lined.

It is proposed that the development will utilise permeable paving as well as attenuation to manage surface water, which will be discharged at a controlled rate into an adjacent pond. The underground attenuation storage has been designed for the 1:100yr +25%CC .

The applicant is advised that drainage will need to be designed to cater for the 1:100-year plus climate change event, utilising the latest allowances available at the time of detailed design. As part of the detailed design, we will also require either;

- plans showing the wider connection of the ponds to ensure surface water discharged into them has an onward flow, or
- infiltration details which show the ponds half-drain times are sufficient to cater for the site's proposed discharge rate and volume.

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 Thames Water foul sewer located on the site.

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.

### Summary of Further Information Required

At this time, we will require the following further information:

#### *Flood Risk and Built Footprint*

- **Overlay required:** The applicant must overlay the proposed built footprint onto the updated EA surface water flood risk mapping.
- **Demonstration needed:** Evidence that no increase in built footprint or land raising occurs within:
  - Flood Zone 3b (functional floodplain),
  - The 1:100 year + climate change extent.
- **Flow path preservation:** Evidence that:
  - The natural surface water flow routes across the site (especially east to west) are preserved, or
  - Suitable alternative routes are provided if blocked by the development.
- **Ditch connectivity:** Demonstrate the onward connectivity of the existing ditch on site and how flow will be managed if the ditch is removed.

#### *Surface Water Drainage*

- **Climate change consideration:** Confirm that the drainage system accounts for latest climate change allowances from EA (e.g., 1:100-year + latest CC).
- **Outfall/ponds:** Provide:
  - Plans showing wider connectivity of ponds (to show onward flow), or
  - Infiltration testing results demonstrating adequate pond half-drain times.

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.



Flood Risk & Drainage Team  
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