AQUA TERRA
CONSULTING

Steve Ashdown		**Our Ref.**	P25035_L1
Planning Officer		**Your Ref.**	DM/23/2866
Mid Sussex District Council		**Date:**	1st September 2025

Dear Steve,

Thank you for providing the recent consultation response from the LLFA at West Sussex County Council (7th August 2025) in response to the proposed Outline Application for up to 1,450 dwellings on a parcel of land east of Ansty Way, Cuckfield Bypass, Cuckfield, West Sussex.

The consultation response has been passed through to Aqua Terra Consultants Ltd as part of our remit in supporting the proposed development.

In order to provide ease of access to each point raised within the response, we have tabulated the relevant points and our responses below.

We can also confirm that our revised report has been prepared in accordance with the Defra (2025) Non-Statutory Technical Standards for SuDS, which supersede the earlier 2015 standards, and with the requirements of West Sussex County Council as the LLFA.

The 2025 Standards establish a national framework for the design, delivery and adoption of SuDS, consistent with the implementation of Schedule 3 of the Flood and Water Management Act. They set out clear requirements across four outcome areas:

- Peak flow control – development should not increase flood risk off-site and peak discharges should be limited to greenfield rates.
- Runoff volume control – post-development runoff volume should not exceed the equivalent greenfield volume for the 1 in 100 year, 6-hour event, with long-term storage provided where necessary.
- Water quality – SuDS must prevent deterioration of receiving water bodies, with pollutant mitigation demonstrated through the Simple Index Approach or equivalent.
- Amenity and biodiversity – SuDS should deliver wider benefits including habitat creation, biodiversity enhancement and opportunities for public amenity.

The design of the proposed SuDS for this site has been assessed against each of these outcome areas and the strategy also accounts for climate change allowances, urban creep, exceedance routing and maintenance/ adoption arrangements, as required under the 2025 Standards.

We would be happy to work with the Local Planning Authority and Thames Water to ensure that any potential planning conditions recommended are suitable for the proposed development.

Yours sincerely,

James Mortimer

Director

LLFA comment	Response
In the greenfield runoff rate calculations, region 1 is being used, which does not reflect the hydrological region for the site. Please send FEH point data file to FRM@westsussex.gov.uk to confirm the location of the calculation inputs. Do not send this to the planning officer, to ensure the data remains confidential and in accordance with FEH Web Service terms of use. Please title the email: DM/23/2866 FEH point file. It is essential that the correct parameters are used when calculating greenfield runoff rate, otherwise surface water flood risk could increase elsewhere.	The hydrological region has been corrected, and revised greenfield rates have been updated in the report – see Section . There is no change to the peak Q1 flow rate, which remains at 460 l/s, although the calculated peak Q1 flow rates for each sub-catchment have increased very slightly as a lower Q1 value was used in the calculation previously (it is now based on the 460 l/s value). The FEH data has also been issued to FRM@westsussex.gov.uk
In the calculations, runoff volume calculations for existing and proposed scenarios is required.	The calculated pre and post development runoff volumes have been calculated and presented within Section 8.2 and 8.5.
As requested previously, evidence of consideration into the use of infiltration drainage in areas away from watercourse corridors will need to be provided at this outline planning stage. No further testing has been completed and the application is currently relying on testing carried out in summer, not winter.	A revised section covering the infiltration potential around the wider site has been included within Section 3.4.4 on the report.
At outline planning stage, we require an outline drainage layout showing proposed location of drainage components, storage volumes, outfall locations and a rough idea of flow rates from each outfall. 3m easements will be required around basins and swales. All outfalls to watercourses must be within the red line boundary, or third party agreements will need to be provided at outline stage.	The drainage layout plans within Appendix G have been enhanced to make the requested information more clearly visible.
The watercourses must have a 3m easement to allow riparian maintenance to take place.	This information has been added to the drainage layout figures (Appendix G).
The ponds are labelled with 'freeboard depth'. We believe this does not reflect freeboard as this should be 300mm following the SuDS Manual. All SuDS should be designed to follow SUDS Manual.	The freeboard in basins has been clearly defined/displayed as per the SuDS Manual (remaining depth between the max design water level - for T30 +CCA event - and the bank level). References in the drawings have been corrected where the "freeboard depth" label may have been misleading.

LLFA comment	Response
As requested previously, further details regarding the use of the pump and emergency procedures following 24 hour failure are required.	Additional measure/procedures have been provided in Section 8.5.1 to give a more robust strategy to mitigate the risk of a pump failure.
The FRA and Drainage Strategy does not cover how the site will remain safe in times of flooding. As mentioned previously, due to the impact crossing heights can have on surrounding development layouts and proposed site levels it is important this is considered for all watercourse crossings at this early masterplan stage. This is to ensure that alterations to facilitate safe access/egress do not impact the proposed development description or likely masterplan layout.	Cross sections of the flow path/watercourse intersections, illustrating the ground elevations, flood levels and deck levels of crossings, have been included within Section 7.2 to illustrate that intersections will remain dry and accessible during a flood event. The exercise was also undertaken for areas in proximity to the Copyhold Gill and issued to the LLFA previously.
We have concerns that there will be a loss of floodplain storage as a result of this development. As mentioned previously, evidence that the impact development could have on floodplain storage, for all sources of flooding has been considered and mitigated against will be required at this stage of planning. This is required at outline application stage due to the potential this could have on developable area on the site and the impact that could have on the development's masterplan.	There is no planned development within the fluvial floodplain area (aside from the bridge crossing as discussed in the FRA). Cross sections at intersections between access routes and surface water flow paths or ephemeral streams have been assessed in Section 7.3 of the report. The crossings will be constructed above the peak flood level, with the crossing utilising open-span style bridge, with no construction within the channels (e.g. no culverts or abutments which may result in a loss of floodplain storage or limit channel flows). . For the few areas of mapped SW flood risk which overlap with development areas (the 1 in 100 year +CCA flooding area in the southern development area), these flood risk areas will not be present post-development owing to the introduction of the drainage infrastructure (i.e. the catchment area will be positively drained, with surface water being directed to the SuDS features rather than ponding on the surface). Calculations have been provided which demonstrate the capacity of the proposed SuDS features to receive and manage runoff within the various site sub-catchments, as well as calculated losses in ponding volume vs volumes provided by representative SuDS features (see Section 7.3).

LLFA comment	Response
The current masterplan and drainage strategy shows several access roads and footpaths/cycle links located within areas of increased flood risk and surface water flow paths. We require further evidence that existing flow paths will not be impeded by any type of development at this stage of planning.	As per point 8 above, we have provided cross sections of the flow path/watercourse intersections, illustrating the ground elevations, flood levels and deck levels of crossings. These illustrate that that existing flow paths will not be impeded by any type of development.
As mentioned previously the calculations need to use FEH2022 rainfall and Cv value 1.	The calculations have been revised to include the updated FEH-22 rainfall data and a Cv vale of 1 for the drainage simulations.
In the calculations, there is extensive flooding in the 1 in 100 year plus climate change event, which is likely to increase flood risk elsewhere. Without addressing the above, surface water flood risk is likely to increase elsewhere, as it has not been adequately demonstrated that the site can drain.	We have upsized the SuDS features to accommodate the additional inflows above the T30+CCA design storm. The drainage model and drainage layout plans have been updated to reflect this and none of the features now flood under the T100+CCA event.