

Stockmans Barn
Church Farm Walk
Upper Beeding
BN44 3HD

**OBJECTION - To Flood Risk Assessment and Outline Drainage Strategy
P25083_R3_Rev3**

The proposed drainage strategy is directing water into an area at high risk of flooding.

Drainage Response:

Horsham District Council - Drainage 03/09/2026

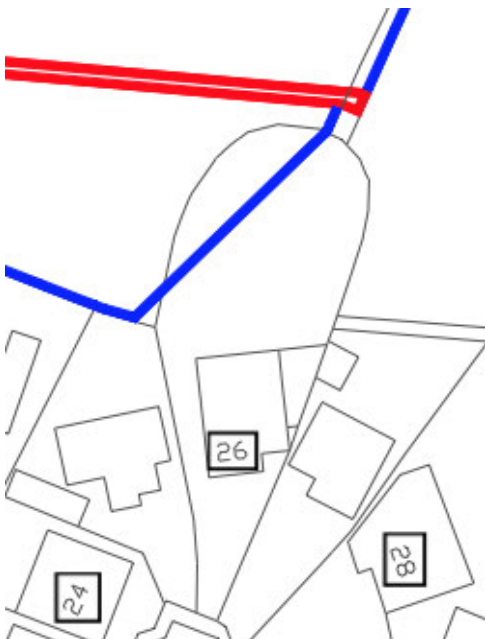
'HDC Drainage consider that the SuDS management train **before the outfall**, is appropriate and a proportionate response to the proposed development.'

However, there seems to be no assurance that the drainage strategy **after the outfall** is also an appropriate and proportionate response.

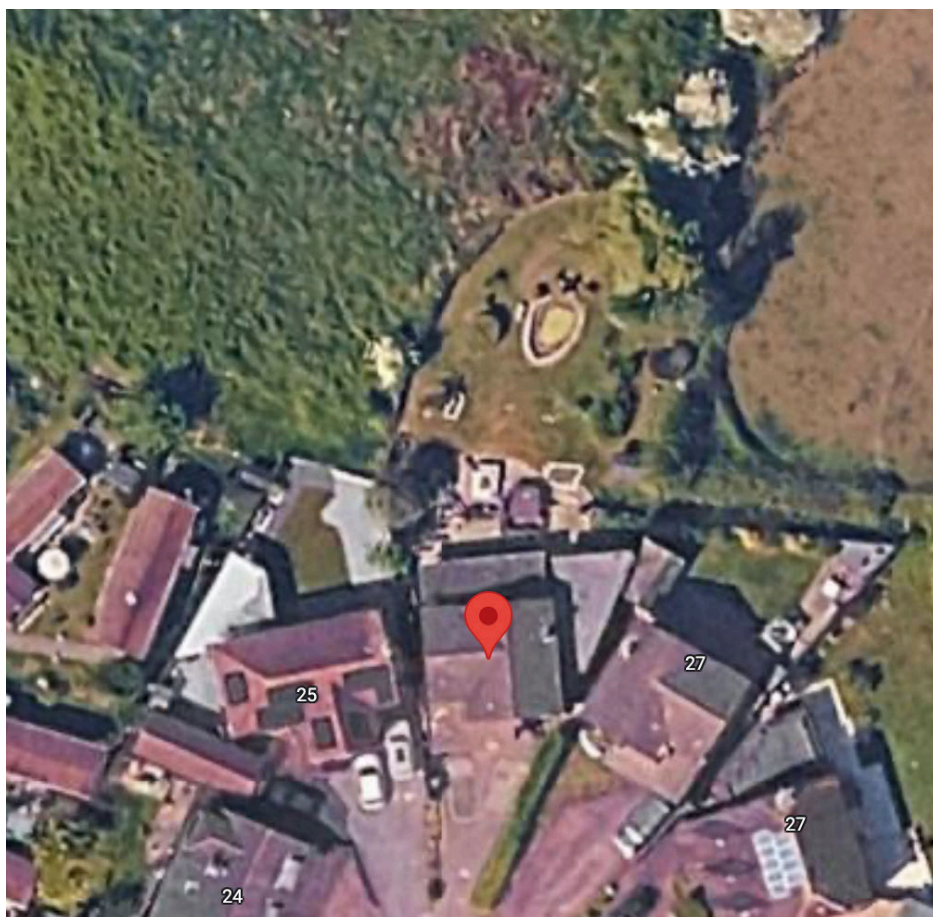
Proposed surface-water outfall – failure to demonstrate no increase in flood risk to No. 26 The Driftway and neighbouring properties.

The proposed surface-water outfall from the swale is a particular concern because it is located immediately adjacent to the garden of No. 26 Driftway. The Flood Risk Assessment and Outline Drainage Strategy Rev3 does not demonstrate that this receiving location can safely accommodate the proposed discharge without increasing flood risk to the adjoining property.

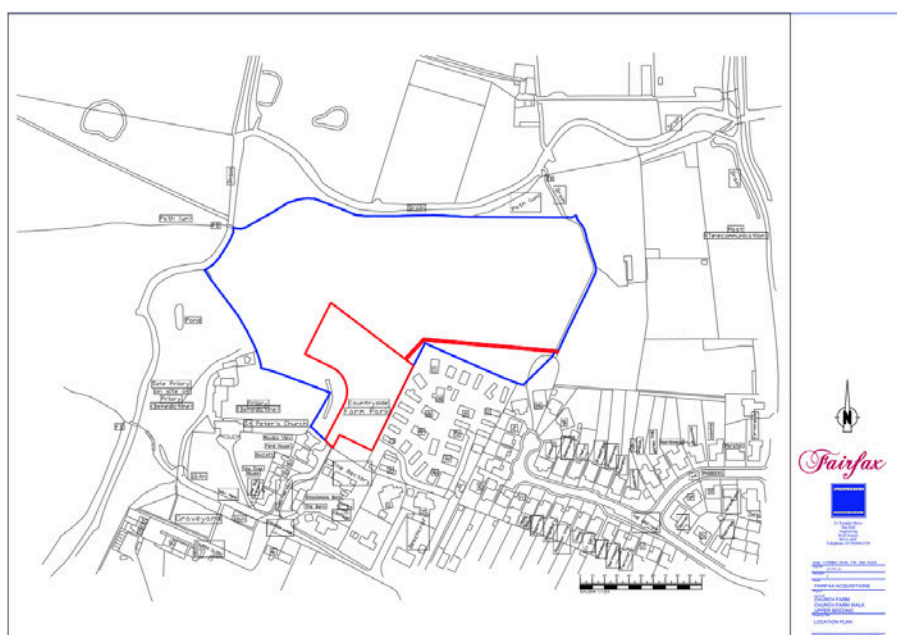
Fairfax Location Plan: 2517 - PL01 Location Rev A - HDC Received: 25/08/2026



The figure above shows the outfall of the drainage system in relation to the garden of property 26 The Driftway.



26 The Driftway: An aerial photograph showing the position of the property in relation to the proposed outfall. Compare with the figure on the previous page.



Fairfax Location Plan: 2517 - PL01 Location Rev A - HDC Received: 25/08/2026

Aqua Terra themselves identify significant constraints at the receiving location. The report records high groundwater vulnerability, potential for groundwater flooding at the surface, and a network of drains to the north where groundwater may be emerging. It also states that the Gault Formation indicates reduced natural infiltration (Rev3, pp.8 and 14).

Church Farm: Flood Risk Assessment and Outline Drainage Strategy P25083_R3_Rev3

Figure 4-4 Flood Risk from Groundwater



Agency and Hydrological (Flood)

- Limited Potential for Groundwater Flooding to Occur
- Potential for Groundwater Flooding of Property Situated Below Ground Level
- Potential for Groundwater Flooding to Occur at Surface

As can be seen in the figure above there is potential for groundwater flooding to occur at the surface not only at the proposed development site but also at the outfall and the properties of The Driftway and The Paddocks and at the horse stables. We have been told by residents that their gardens regularly flood each winter as it is.

The proposed drainage strategy does not rely upon infiltration because of concerns regarding shallow groundwater. Instead, surface water is to be discharged at a restricted rate to the drain to the north-east. However, Aqua Terra states that **“A condition survey of the drain should be undertaken to confirm that water can freely flow within the drain without obstruction”** (Rev3, p.23). This is an important unresolved matter because the capacity and condition of the receiving drain have therefore not been demonstrated.

CONDITION SURVEY, ORDINARY WATER CONSENT:

Church Farm: Flood Risk Assessment and Outline Drainage Strategy P25083_R3_Rev3, page 23.

6.2.3. Discharge to surface water body

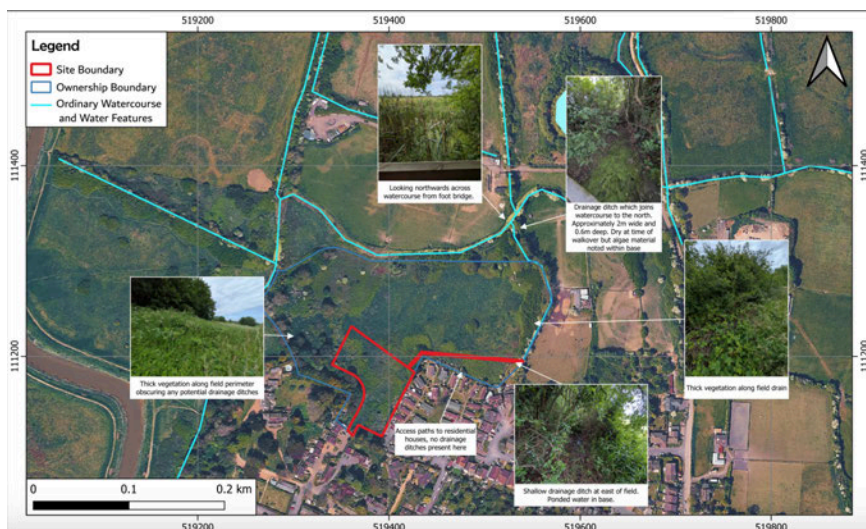
'A condition survey of the drain should be undertaken to confirm that water can freely flow within the drain without obstruction. The outfall to the ditch would require Ordinary Watercourse Consent.'

Appendix I - Hydrology Walkover Notes



Thick vegetation along field drain

The above photo, taken from the Hydrology Walkover Notes below, shows thick vegetation potentially obstructing the drain.



Significantly, Aqua Terra expressly acknowledges that **“There is potential for the outfall to become surcharged due to fluvial flooding of the land to the north of the Site.”** They model a surcharged outfall at 4.76m AOD and state that this results in **33.3m³ of flooding from the swale**, with the water spilling into the northern field (Rev3, p.23; Appendix F).

The report therefore establishes that under a foreseeable flood scenario the receiving outfall can become hydraulically constrained and the swale can flood. This is not merely a theoretical objection raised by a neighbour: it is a residual flood mechanism identified and modelled by the applicant’s own drainage consultant.

The receiving environment is particularly concerning because Figure 6-3 of Rev3, headed **“Photo of drain on eastern boundary of land ownership”**, shows pooled water within the receiving drain area (Rev3, p.24). When considered alongside the report’s findings concerning groundwater, the low-lying northern area, the presence of land drains and the acknowledged potential for the outfall to surcharge, this raises a material question as to whether the proposed outfall has been located in an area capable of safely receiving the discharge.

Appendix I - Hydrology Walkover Notes



Shallow drainage ditch at east of field.
Ponded water in base.

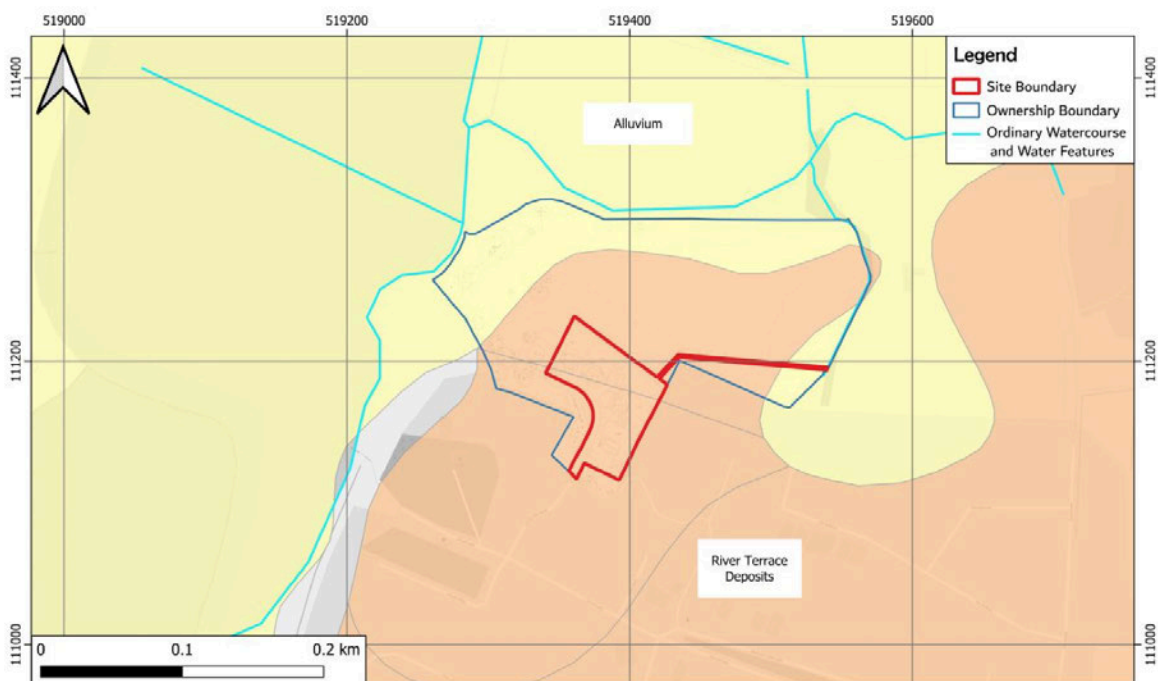
The photo above shows ‘ponded water’ at the location of the outfall. Directly next to the garden of 26 The Driftway.

Appendix I - Hydrology Walkover Notes



Poorly Draining Alluvium: When water slows down in wider floodplains it drops much finer particles like **silt and heavy clay**. These fine-grained layers pack tightly together, trap moisture, and are highly prone to seasonal waterlogging.

Figure 2-3 Superficial deposits



As can be seen above alluvium deposits are present in the area of the outfall, The Driftway, The Paddocks and the horse stables.

4.2. Surface water

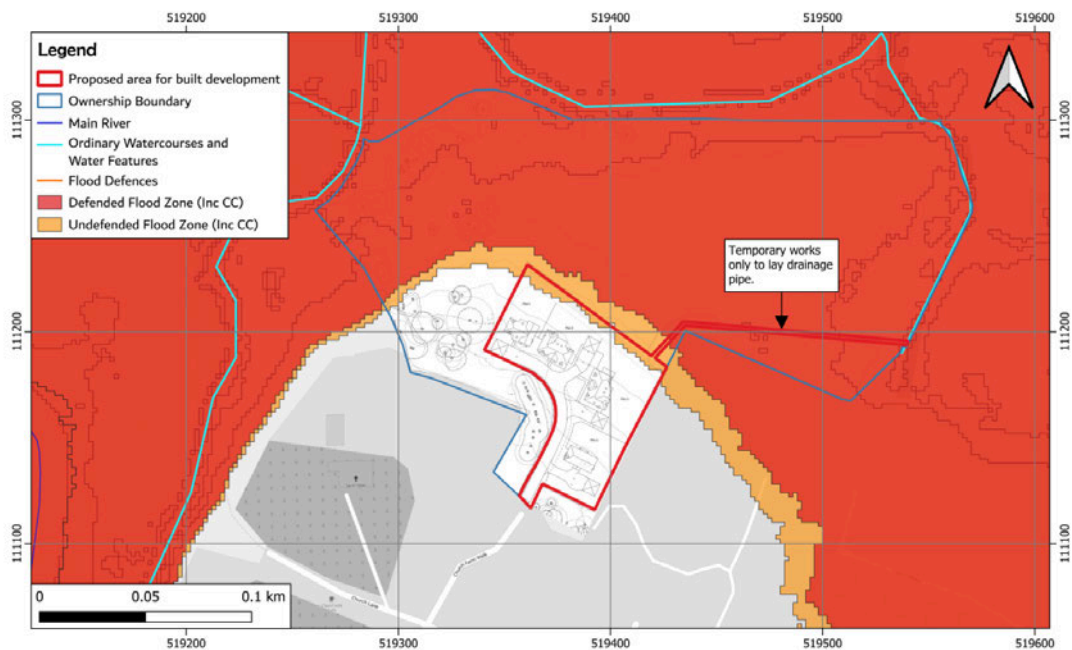
Surface water (pluvial) flooding is usually associated with extreme rainfall events but may also occur when rain falls on land that is already saturated or has a low permeability. Rainfall that is unable to infiltrate into the ground generates overland flow which can lead to flooding or 'ponding' in localised topographical depressions before the runoff is able to enter local drainage systems and watercourses.

The EA's Risk of Flooding from Surface Water (RoFSW) flood map, updated in February 2025 to account for climate change, is shown in Figure 4-3. No Surface water flood risk is present within the area proposed for development, and there are some very small isolated 'Low' risk areas within the north of the Ownership extent. The Site is considered to be at very low risk of surface water flooding.'

In the quote above Aqua Terra only refers to the flood risk on-site. There is no mention of the flood risk at the outfall and the area surrounding the outfall. They also draw attention to 'poding' in localised topographical depressions before the runoff is able to enter local drainage systems and watercourses.' This was recorded by Aqua Terra at the location of the outfall next to the garden of 26 The Driftway.

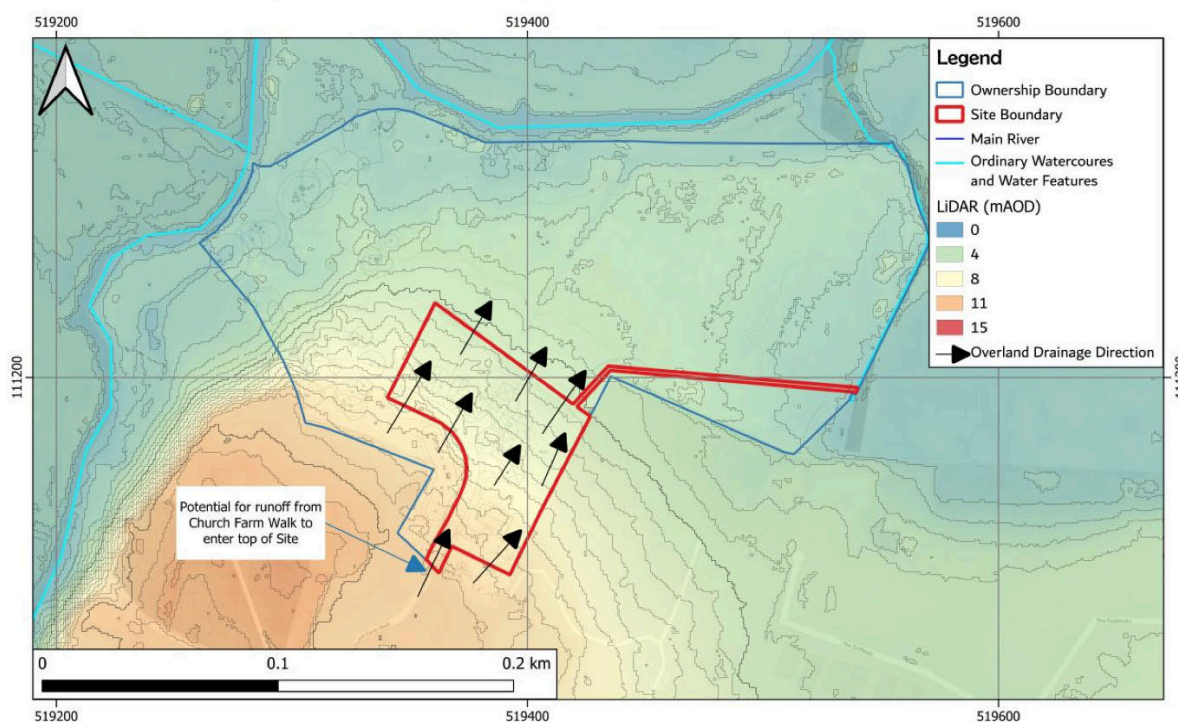
As can be seen in figure 4-3 below the area of the outfall and The Driftway, The Paddocks and the horse stables are at high risk of flooding from surface water.

Figure 4-3 Risk of Flooding from Surface Water



The figure above shows the high risk of surface water flooding at the outfall, The Driftway, The Paddocks and the horse stables.

Figure 2-2 Existing ground elevations from LiDAR data



In the figure above the area of the outfall The Driftway, The Paddocks and the horse stables can be seen to have low ground elevations from 0m AOD to 4m AOD. It appears that the 0m AOD elevation extends from the outfall towards 26 The Driftway.



Comparing the above plans, it can be seen that all of the properties have ground elevations of 0 - 4m AOD.



The figure above shows the 0m AOD extending from the outfall to 26 The Driftway.



The Environment Agency map above shows that the outfall and the garden of 26 The Driftway is within Flood Zone 3 and that the house of 26 The Driftway and neighbouring properties are within Flood Zone 2. It makes no sense to increase the flood risk for properties already within flood zones 2 and 3.

DISCREPANCY IN OUTFALL - INVERT LEVEL:

There is also an apparent discrepancy which should be resolved before the drainage proposal can be regarded as satisfactorily demonstrated. **Section 6.2.3 and Figure 6-2** identify the outfall/drain invert as approximately **2.4m AOD**, whereas the **Causeway model** identifies the outfall node with an invert of **1.0m AOD**. The model should be reconciled with the proposed physical drainage design because the levels are directly relevant to the hydraulic performance of the outfall.

OUTFALL - INVERT LEVEL: 2.4m AOD.

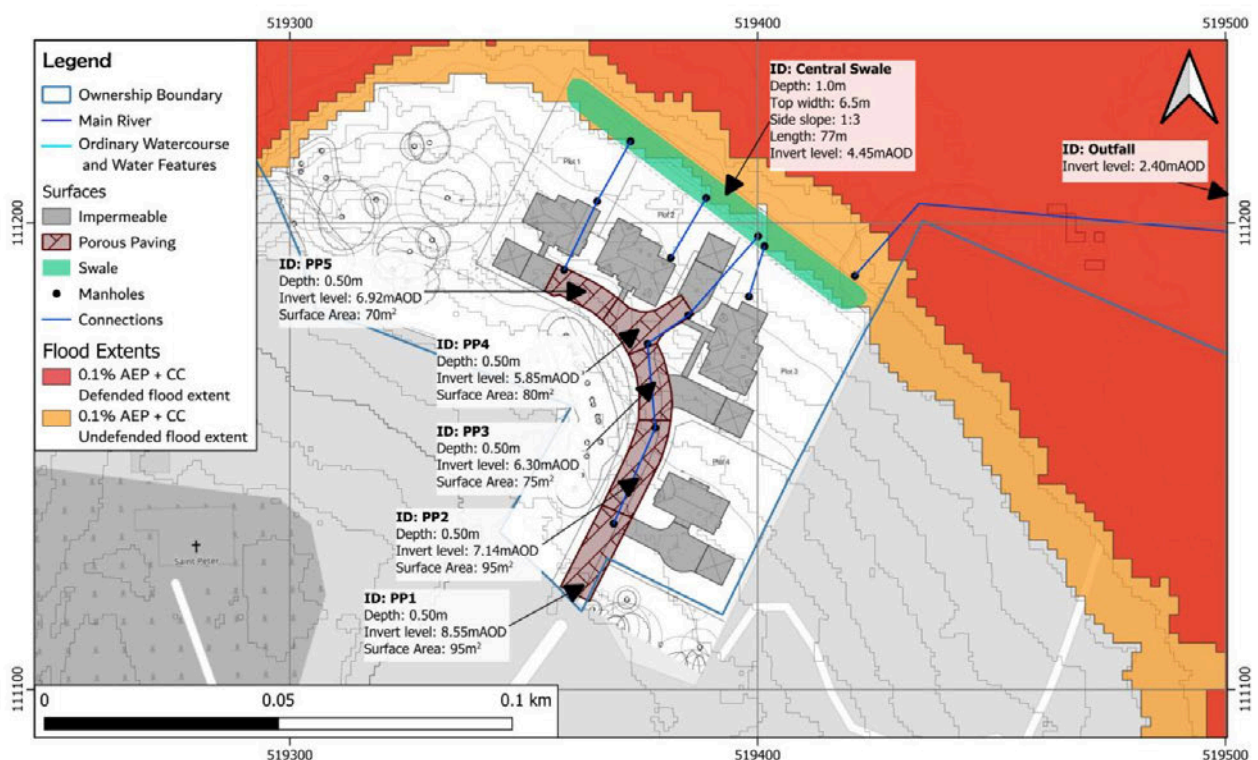
Church Farm: Flood Risk Assessment and Outline Drainage Strategy P25083_R3_Rev3, page 23.

6.2.3. Discharge to surface water body

'Figure 6-4 shows a cross-section profiles through the swale and towards the outfall drain (which has an invert of **2.4m aOD**).'

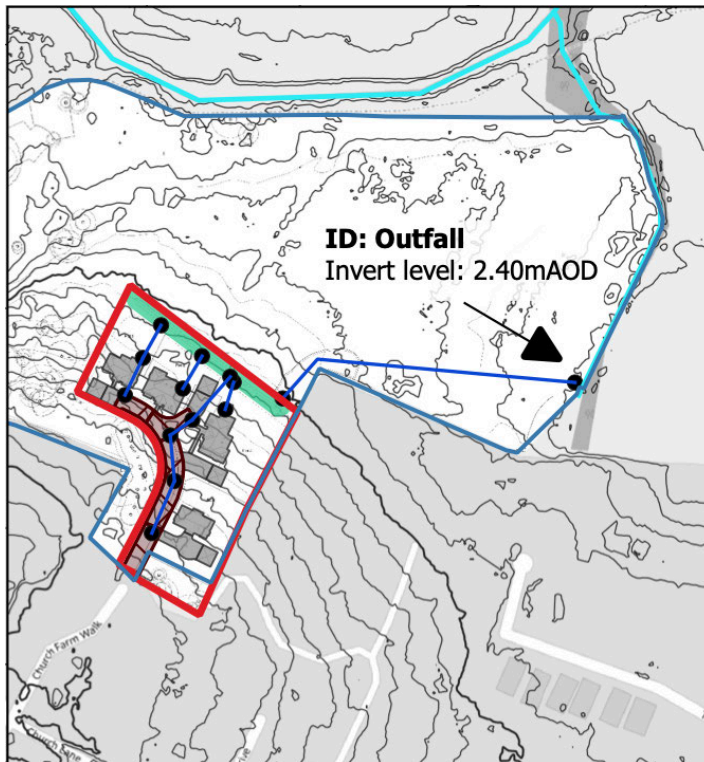
Church Farm: Flood Risk Assessment and Outline Drainage Strategy P25083_R3_Rev3, page 22.

Figure 6-2 Properties of key SuDS features



The above figure shows the 2.40m AOD discrepancy.

Appendix D Proposed Drainage Plan



The above figure taken from appendix D provides further evidence of the 2.40m AOD discrepancy.

Causeway model:

OUTFALL - INVERT LEVEL: 1m AOD

Church Farm: Flood Risk Assessment and Outline Drainage Strategy P25083_R3_Rev3

Appendix E Causeway Flow Report

 Causeway	Aqua Terra Consultants Ltd	File: Church Farm_v7_Surcharged.pfd Network: Storm Network MJF 08/12/2025	Page 1
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<u>Nodes</u>											
Name	Area (ha)	T of E (mins)	Cover Level (m)	Node Type	Manhole Type	Diameter (mm)	Easting (m)	Northing (m)	Depth (m)	Invert Level (m)	
✓ Outfall			2.300	Manhole	Adoptable	1200	519476.541	111217.478	1.300	1.000	

The Causeway model above shows the 1m AOD discrepancy.

Either the outfall is 2.4m or 1m AOD. This is a fundamental engineering measurement that must be correct and accurate.

NPPF Policy 7:

The National Planning Policy Framework, Policy F7, requires it to be demonstrated that development will not increase flood risk elsewhere.

NPPF Policy 8:

Policy F8 requires SuDS to be designed in accordance with the National Standards for Sustainable Drainage Systems and to have appropriate maintenance arrangements.

The National SuDS Standards:

The National SuDS Standards specifically require that runoff from development does not increase flood risk elsewhere and that SuDS mitigate increased flood risk to people and property adjacent to or downstream of the development.

Conclusion:

In these circumstances, I do not consider that the present submission demonstrates that the proposed outfall is capable of discharging safely without increasing flood risk to the immediately adjoining property at No. 26 The Driftway and neighbouring properties.

This is a fundamental issue with the proposed drainage arrangement rather than a matter that should simply be left to a future detailed drainage condition. Before permission is granted, the Council should be satisfied that the receiving drain has adequate capacity and free-flow conditions, that the proposed outfall levels are correctly established, and that the interaction between the outfall, groundwater, fluvial flooding and the adjoining property has been satisfactorily demonstrated.

Until this has been demonstrated, the proposal does not satisfy the requirement that development should not increase flood risk elsewhere.