

Statement from Mrs Jacqueline Simmons. Regulation 19 Submissions references 1189185,1191239,1191333,1191339,1191343

Matter 5: Flood Risk

Question 53.

The post Reg19 consultation SFRA Level 1 2024 contains incomplete information on known cases of historic flooding. It cannot be considered robust, reliable or sound enough as a basis for the conclusions or decision making on individual sites in the MSDC Level 2 SFRA now published.

- a) In the SFRA Level 1 report Appendix A - *MSDC & WSCC Historic Records*, page 24, only 4 instances of flooding are recorded by MSDC in Reeds Lane. None recorded by WSCC.
- b) Significantly more flooding, however, has occurred in Reeds Lane and is recorded in *WSCC Highways Street History Reports*. Copies of a selection from that report were included in both my Reg 18 and Reg 19 submissions (1189185 & 1191399) so MSDC were aware of this flooding prior to the above SFRA reports publication.
- c) In my Reg 19 submission refer (1189185), on page 44, Appendix A there is a copy of one of the reports which shows flooding reported on 8 separate dates in the period 01/01/2022 to 25/09/2023.
- d) That flooding directly affected both sites DPSC3 & DPSC6.
- e) Flooding in London Road Sayers Common, location of the proposed main access routes to sites DPSC3 and DPSC5, is also recorded in its WSCC Highways Street History which can be obtained from them.
- f) Sewage flooding took place in Reeds Lane at the eastern end of Kingsland Cottages in November and December 2023 and was attended by Southern Water & WSCC Highways. This is also not recorded in SFRA Level 1 or 2 reports.
- g) The report on page 61 paragraphs 6.48 & 6.49 refers to the *West Sussex Local Flood Risk Management Strategy 2021- 2026*. It lists places of priority of properties at risk of flooding from surface water. On page 37 of that report it states “*Mid Sussex contains six significant clusters of properties that are at risk of flooding. These are Burgess Hill, Copthorne, Hassocks, Haywards Heath & Lindfield, East Grinstead, and Sayers Common.*”
- h) The missing information in the MSDC SFRA Level 1 report directly affects the accuracy of the SFRA Level 2 report.
- i) On page 22 of the SFRA Level 2 report for site DPSC3 Flood History it reports no record of flooding in Reeds Lane but that is due to the inaccuracy of its records as detailed above.
- j) In existing drainage features it does not make clear the stream which enters the site at its eastern boundary, by the proposed new main access road, is fed by water from land to the E and SE of the site, not under the site owner’s control.
- k) Similarly, it does not mention that the streams in the west and south west areas of the site are feed from off site land to the south. It also gives the flow paths as north to south when it is the opposite. The accuracy of its compiling needs to be questioned.
- l) More missing details of flooding affecting the sites can be found in my Reg 19 submissions, 1189185 (section h pages 36-41) and 1191333, 1191339 and 1191343.
- m) There is no formal method on the MSDC website to report to it cases of flooding. No phone number, email address or a form to fill in. Consequently, residents report flooding to other bodies instead of MSDC. This results in MSDC continually under reporting cases of flooding in its SFRA which can lead to poor and less effective conclusions being made with regards to planning decisions, and long term consequences for residents.
- n) Introducing an accessible reporting method would make MSDC’s SFRA report more robust and better able to meet the requirements of Policy DSPS4 Flood and Drainage page 57 in the MSDC DP. It states SFRA mapping is kept up to date with new flood events. Adding to that policy the requirement for a reporting method could ensure actual compliance strengthening the SFRA report. SFRA Level 1 page 116 paragraph 10.13 recommends that it is reviewed a minimum of every 5 years. This recommendation should also be added to policy DSPS4 to keep the SFRA up to date instead of the 9 year gap between

the previous report in 2015 and the current one in 2024. That would also make that part of the plan sounder and more focused.

It is also noteworthy that when scoring site allocations using the Site Methodology method the only question asked seemed to be which Flood Zone a site was in which only relates to Fluvial flooding. Surface Water Flooding was not taken into consideration when scoring sites for allocation.

Question 54

The geology of the district is relevant to flood risk. This, and the need for its mitigation, needs to be considered on where to focus large scale housing developments and infrastructure to make the plan sound.

- a) Wealden Clay is impermeable, so infiltration measures are not a viable method of flood mitigation. This especially affects pluvial flooding.
- b) Attenuation with a controlled discharge to watercourses needs to be used instead in these cases.
- c) This method, be it storage tanks or open ponds, requires a large amount of land to be set aside for existing and future levels of rain fall to be accommodated with later discharge to a watercourse.
- d) The SFRA Level 1 page 90 paragraph 8.29 confirms a predicted significant increase in rainfall for Mid Sussex due to climate change.
- e) Development not only removes unoccupied land where previously the pluvial flood water was able to safely lie but it also raises land levels forcing such water to be directed elsewhere.

The larger the development the more land that needs to be set aside for this mitigation. MSDC have not considered the percentage area of in the sites needed for this when deciding site allocation and the house numbers it should generate. Nor have they followed policy DPS4 in that site plans submitted, such as those for DPSC3 & DPSC6. These show that the principal areas for development, including schools, are in the areas of the sites suffering pluvial flooding or needed for its mitigation.