



Chris Banks &lt;bankssolutionsuk@gmail.com&gt;

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**Fwd: FW: NSF - Tully De'Ath response to Comments from WSCC and the EA**

1 message

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**Chris Banks** <bankssolutionsuk@gmail.com>  
To: Chris Banks <bankssolutionsuk@gmail.com>

1 February 2017 at 12:14

----- Forwarded message -----

From: **Dinny Shaw**

Ben

Please find attached and below a response to the EA comments and WSCC comments on the most recent Flood Risk Assessment for New Salts Farm.

I have copied the programme officer so that this information may also be shared with the Inspector and inform the Hearing Session on Issue 8.

As previously set out we are of the view that for the purposes of demonstrating that the site is capable of being allocated in the ALP without flood risk constraint we have provided enough detail to demonstrate that there are viable technical solutions to overcome flood risk at the site. Further the information we have provided demonstrates that the development would be safe for its lifetime, without increasing flood risk elsewhere and has sought to reduce flood risk overall.

We trust that you agree and would welcome the opportunity to discuss and agree common ground in this regard with Adur, WSCC and the EA.

Kind regards

Dinny

**Dinny Shaw MRTPI**  
Principal Planner**t:**

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**From:** Andrew Picton [mailto:[ajp@tullydeath.com](mailto:ajp@tullydeath.com)]  
**Sent:** 31 January 2017 17:23  
**To:** Dinny Shaw  
**Cc:**  
**Subject:** NSF - Tully De'Ath response to Comments from WSCC and the EA

Dinny

With reference to the letter from WSCC dated 5<sup>th</sup> January (actually received 27<sup>th</sup> January) concerning the New Salts Farm flood risk assessment, we have added our responses (in green) on a point by point basis to their original letter.

To summarise the key issues:

Clarification was required on how the new modelling of the Lancing Brookes system was undertaken. We can confirm that JBA (who produced the SFRA for ADUR) undertook the modelling on our behalf, in accordance with the standard requirements set down by the EA. The original SWMP model was very basic and would not be suitable to provide the level of detail required for our analysis. However the raw data was taken from the original model and has been improved upon. It is anticipated that the model will be issued to the EA and WSCC for vetting and ultimately for their (and WSCC) use.

The analysis of the ditch system makes allowances for the new climate change values and a tide lock event. In response to WSCC concerns we have subsequently undertaken additional modelling to assess the impacts of high ground water levels across the catchment and the results indicate that surface flooding on the site is not significant and can be appropriately managed as part of the detailed design process.

The site currently discharges surface water via a combination of infiltration and run-off into the ditches. We are proposing to replicate this within the new drainage design. As part of the detailed design stage infiltration testing will be undertaken to confirm which areas are suitable for infiltration. Where infiltration is not possible the surface water run-off will be directed to the existing ditch network, which will be controlled to ensure the run-off rate will not exceed greenfield rates, in accordance with standard practice.

WSCC had concerns that there is insufficient ground water monitoring on the site and that infiltration would not be appropriate. In response, we do have limited ground water monitoring to the west of the site (which is ongoing) but we also have 12 months of monitoring on the eastern side of the site, which has demonstrated that shallow infiltration would be feasible. We have also discussed infiltration with the soils specialist currently working in the site who confirm that shallow infiltration is feasible. The ground water monitoring will continue and will be used to inform the design as to which areas would generally drain to the ditch system or which would infiltrate into the ground.

It is recognised that there will be times where the ground water is very high and reduces the effectiveness of infiltration, however surface water drainage will be linked to the Lancing Brookes system. The SWMP advises that the ground water levels do not significantly affect the water levels within the ditches, consequently there are two disposal methods available for this site.

It is also recognised that there will be rare occasions when the ditches are tide locked and the ground water levels are high. There will be significant areas made available across the site to accommodate surface flooding, and the proposed units types have been designed to provide accommodation at first floor and above, with the ground floor areas are used for parking and utility space.

A full quotative drainage assessment has been requested however at this time would be difficult to provide this level of information when the site is only being considered for inclusion within the Development Plan.

The FRA was produced to demonstrate that there are viable technical solutions to protect the site from flooding without adversely affecting the surrounding areas. It is understood that a greater level of analysis will be required when the site is considered as part of any planning application.

**In response to the Environments Agency's letter dated 30<sup>th</sup> January :**

We can raise the first floor level by 71mm to accord with the level requested by the EA.

The EA recommendations for flood protection will be incorporated into the scheme.

The EA recommendations for Flood Emergency Plan will be incorporated into the scheme.

Regarding the Surface Water Flood Risk the response to WSCC attached will cover this.

Regards

**Andrew Picton | Associate Director**



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**4 attachments**

 **PAC\_SLTSDN\_00154 - EA comments.pdf**  
163K

 **50% runoff with new channel and tide locking, 100 yr + 40% CC event.pdf**  
2600K

 **NSF -TD response to WSCC letter.doc**  
140K

 **NSF - JBA Summary.pdf**  
1079K