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Working in partnership with

Matthew Taylor
Planning and Environmental Services
Wealden District Council
Council Offices
Vicarage Lane, Hailsham
BN27 2AX

Date: 23 February 2022

Our ref:SUD/PC/WD/22/003
Your ref: WD/2021/2356/MAO

Dear Matthew,

SUD/PC/WD/22/003 - OUTLINE APPLICATION FOR THE ERECTION OF UP TO 38... LAND AT OLD ORCHARD HOUSE, HOREBEECH LANE, HORAM, TN21 9DZ

Received Date: 25 January 2022

Position of the Pevensey and Cuckmere Water Level Management Board and the Lead Local Flood Authority:

No objection	The information provided is satisfactory and enables the PCWLMB and LLFA to determine that the proposed development is capable of managing flood risk effectively.	
No objection	The information provided is satisfactory and enables the PCWLMB and LLFA to determine that the proposed development is capable of managing flood risk effectively. Although there will be a need for standard conditions which are outlined in this response.	
No objection in principle subject to the imposition of conditions	Whilst the application documentation has not met all the County Council's and the Board's requirements, it is possible that the risk is capable of being mitigated to acceptable levels by the application of planning conditions which are outlined in this response.	**X**
Objection due to Insufficient Information	The applicant has failed to meet the requirements to assess its acceptability in flood risk terms. The PCWLMB and LLFA will respond in 21 days of receipt of the requested information	
Objection	The application presents an unacceptable on site/off site flood risk.	

Cont./...

Detailed Comments:

This outline planning application is for up to 38 residential units, with all matters reserved excluding access. We understand that this follows the dismissal of a non-determination appeal of a full application for 51 dwellings: Appeal Ref: APP/C1435/W/19/3235754.

As previously noted in our response to planning application WD/2020/2063/MAJ, there is a significant surface water flow path through the site. Should the application be approved, information submitted to discharge planning conditions should demonstrate that the proposed ground levels within this area allows the conveyance of this flow route without increasing flood risk on or offsite. It should also demonstrate that this area will be communally maintained for the lifetime of the development.

We note that the Flood Risk Assessment states that surface water runoff will be limited to the corresponding 1 in 1, 1 in 30 and 1 in 100 greenfield runoff rates. While this restricts the peak runoff from the application to the greenfield runoff rates, it does not manage the potential impacts of increased volumes on the receiving watercourses. As a result, we recommend that the applicant explores discharging runoff at the mean annual runoff rate (Qbar) or provide long term storage volume based on the 1 in 100 6-hour storm.

If the Local Planning Authority is minded to grant planning permission, the PCWLMB and LLFA requests the following comments act as a basis for conditions to ensure surface water runoff from the development is managed safely:

1. Prior to the commencement of development, a detailed surface water drainage system shall be submitted in support to and approved in writing by the Local Planning Authority. The surface water drainage system shall incorporate the following:
    a. Detailed drawings and hydraulic calculations. The hydraulic calculations shall take into account the connectivity of the different surface water drainage features. The calculations shall demonstrate that surface water flows can be limited to the greenfield runoff rates for rainfall events with an annual probability of occurring greater than 1 in 2.33 **and mean annual discharge (Qbar)** for rainfall events with an annual probability of occurrence less than 1 in 2.33, including those with a 1 in 100 (plus climate change) annual probability of occurrence. An allowance for urban creep (recommended 10% increase in impermeable area) shall be incorporated within the calculations.
    b. The proposed ground levels adjacent the western and southern boundaries will allow for the conveyance of the existing overland surface water flow route without increasing flood risk on or offsite.
    c. The detailed design of the surface water drainage features (attenuation ponds and swales) shall be informed by findings of groundwater monitoring between autumn and spring. The design should leave at least 1m unsaturated zone between the base of the drainage structures and the highest recorded groundwater level. If this cannot be achieved, details of measures which will be taken to manage the impacts of high groundwater on the hydraulic capacity and structural integrity of the drainage system should be provided.

d. The detailed design shall include information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely.

2. A maintenance and management plan for the entire drainage system shall be submitted to the planning authority before any construction commences on site to ensure the designed system takes into account design standards of those responsible for maintenance. The management plan shall cover the following:

a. This plan should clearly state who will be responsible for managing all aspects of the surface water drainage system, including piped drains.

b. Evidence of how these responsibility arrangements will remain in place throughout the lifetime of the development

These details shall be submitted to and approved in writing by the Local Planning Authority and shall thereafter remain in place for the lifetime of the development.

4. The applicant should detail measures to manage flood risk, both on and off the site, during the construction phase. This may take the form of a standalone document or incorporated into the Construction Management Plan for the development.

5. Prior to the construction of the outfall, a survey of the condition of the watercourse which will take surface water runoff from the development shall be investigated. Results of the survey shall be submitted to and approved in writing by the Local Planning Authority. Any required improvements to the condition of the watercourse shall also be included and, if approved by the Local Planning Authority implemented accordingly.

6. Prior to occupation of the development evidence (including photographs) should be submitted showing that the drainage system has been constructed as per the final agreed detailed drainage designs.

The application site discharges surface water runoff into the internal drainage district of the Pevensey and Cuckmere Water Level Management Board which is downstream of the application site. Therefore, the applicant should agree surface water discharge rates from the site with the Board.

If you or the applicant/agent wishes to discuss any of the points raised in this letter, please contact the case officer on SUDS@eastsussex.gov.uk.

Yours sincerely

[redacted]

Nick Claxton
Team Manager - Flood Risk Management
On behalf of Flood Risk Management ESCC and Pevensey and Cuckmere WLMB

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