My reference GK/LV8000

ask for Graham Kean

date 9 February 2022

Wealden District Council
Council Offices, Vicarage Lane
Hailsham
East Sussex BN27 2AX

website : www.wealden.gov.uk

MEMORANDUM

Mr M Taylor, Planning

your reference

Planning Application WD/2021/2356/MAO
Land at Old Orchard House, Horebeech Lane, Horam

I write further to your e-mail of 25 January 2022 regarding the above planning application and I would have the following comments.

Flood Risk

The site lies within EA Flood Zone 1, so the sequential test is met and the exception test is not required for this site. The site does not appear to be at risk from tidal, sea or fluvial flooding or from failure of a drainage asset such as a canal or reservoir. The majority of the site is at very low risk of flooding from surface water, but there are flowpaths following the watercourse and another funning north to south through the site. There is no reliable information on groundwater with depths ranging from 3 to 47 metres below ground level suggested.

There is an ordinary watercourse running southwards, just inside the eastern boundary of the site. This joins another ordinary watercourse along the southern boundary of the site, just inside the south-eastern corner of the site. There is a pond in the north-eastern corner of the application site and others in the vicinity.

There are no records of flooding in this area within the Council's land drainage database.

The Geological Map states that the site is on the Wadhurst Clay Formation of mudstones.

Surface Water Drainage

Infiltration is the first recommended drainage method in the SUDS hierarchy but the underlying mapped geology and the presence of watercourses on the site suggest that this is very unlikely to be a usable solution for this site.

There are no adopted, public, surface water sewers in the vicinity of the site, so this method of surface water drainage cannot be used.

The site is to be drained via a conventional pipe and manhole system to an attenuation tank sited towards the south of the site. The outlet is via a hydrobrake to the ordinary watercourse running inside the eastern boundary of the site. It will be necessary to provide evidence that this receiving watercourse is of sufficient size and condition to accept the flows from the site.

The surface water flowpath through the site is addressed by a 2.4 metres "corridor" along the western boundary of the site to the southern watercourse. It may be helpful to make this a swale. The existing pond and its overflow pipe to the watercourse is to be retained.

In considering the drainage principles proposed for the site, the Lead Local Flood Authority, ESCC, will require full detail in the drainage calculations used to design the system and Wealden, as the planning authority, would support this request. The calculations should prove that the final design can accommodate the site runoff rates for the standard 1 in 100 year rainfall event plus 40% climate change allowance plus urban creep. On this underlying geology, the porous paving can only be considered as a means of storage and cleansing within these calculations, not as a means of disposing of the water.

It is stated that maintenance activities for the whole surface water drainage system will be by "an agreed appointment" which will have to be a site management company set up to maintain the system for the lifetime of the development. A generic maintenance schedule is provided but the Council would expect to see details of a site specific maintenance plan in due course when a surface water drainage scheme is finalised and before first occupation.

Notes

Provision of the foul sewage arrangements is for Southern Water to comment on. There is an existing sewage overflow outfall from the pumping station to the stream crossing the site which may require diversion.

Please note that any new connection to an ordinary watercourse will require an Ordinary Watercourse Consent from the Lead Local Flood Authority over and above any planning permission which may be issued.

For information, please note that the development may increase the rate and/or volume of water being discharged into the Pevensey Levels Internal Drainage District (compared to the status quo), and so an application may need to be made to the Pevensey & Cuckmere Water Level Management Board seeking consent under the terms of its Byelaws. If it is considered that a proposed increase in flows can be safely and adequately dealt with by the receiving waterbody and wider drainage network, then consent may be issued (although consent is not guaranteed to be given). Any permission granted by the Board would be subject to conditions, usually including entry into a legal agreement and the payment of a Surface Water Development Contribution to the Board. Details and further information can be found on the website at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf. Further details regarding the Board's application procedure and associated payments which may become due are also available on this website.

Conclusion

In my opinion, the information provided within this application is adequate for this application subject to the caveats mentioned above. Should you be minded to allow planning permission, I would wish to see the following **conditions** applied namely:-

> "No development shall take place until full details of the surface water drainage scheme, have been submitted to and approved in writing by the local planning authority. The surface water drainage scheme should be confirmed as deliverable by an assessment of the site's potential for disposing of surface water by means of a sustainable drainage system. The submitted details shall include the following:
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> i. Supply detailed plans, layouts and sections of the proposed drainage system and pollution/silt control devices and construction details of any non-standard features.
>
> ii. Provide a full management and maintenance plan for the development which shall include the setting up of any necessary company to secure the operation of the scheme throughout its lifetime.
>
> iii. Supply full hydraulic calculations to the correct level of climate change (40%), to the satisfaction of the Lead Local Flood Authority.
>
> iv. The existing pond and its overflow pipe to the watercourse is to be retained.
>
> v. Provide evidence that the receiving watercourse is of sufficient size and condition to receive the flows from the site.

NOTE: Attention should be given to non-statutory technical standards for sustainable drainage systems, the ESCC "Guide to Sustainable Drainage Systems in East Sussex" and the total costs of implementing the drainage scheme, that is design, construction and maintenance costs.

REASON: To reduce the risk of flooding, both on and off site, to improve and protect the water quality and improve habitat and amenity having regard to the guidance set out in the National Planning Practice Guidance and at paragraphs 163 and 165 of the NPPF and any local plan policies where appropriate according to the local planning authority, for example WCS14 of CSLP, saved policy CS2 of the Wealden Local Plan."

Please contact Graham Kean if you wish to discuss the matter further or to meet on site.

Graham Kean
Engineer and Countryside Officer