



Working in partnership with

Claire Turner
Planning and Environmental Services
Wealden District Council
Council Offices
Vicarage Lane, Hailsham
BN27 2AX

Date: 1 March 2023

Our ref: SUD/PC/WD/23/008
Your ref: WD/2022/3222/MAO

Dear Claire,

SUD/PC/WD/23/008 - DEVELOPMENT OF UP TO 124 NO. RESIDENTIAL DWELLINGS, ASSOCIATED INFRASTRUCTURE (INCLUDING A NEW ACCESS JUNCTION ONTO THE A271) AND OPEN SPACE., LAND TO THE SOUTH OF THE A271 AND EAST OF THE A22, LOWER HORSEBRIDGE, HAILSHAM
Received Date: 8 February 2023

Position of the Pevensy 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.	X
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.	
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./...

Pevensy and Cuckmere Water Level Management Board and East Sussex County Council are working together to advise planning authorities on the impact of development on local flood risk within the Board's catchment

Detailed Comments:

The proposed development site is located near Lower Horsebridge Stream, a tributary of the River Cuckmere, which is a designated main river at this location. Updated hydraulic modelling of the watercourse has been carried out and demonstrates that the proposed development will be located outside of the 1 in 100-year plus climate change flood extents. This includes the proposed attenuation ponds which will provide storage of additional surface water runoff volumes arising from the development.

British Geological Survey data that we hold indicates that groundwater levels beneath the site may be less than 3m below ground level beneath the site. We therefore request that groundwater monitoring is carried out between November and April, when groundwater levels are at their highest, to understand groundwater levels beneath the site and determine whether mitigation measures are required to avoid ingress of groundwater into the ponds and loss of attenuation volumes.

It is likely that the outfalls from the drainage system will be blocked during a flood event which could prevent runoff discharging into the watercourse. We request that the proposed drainage system is modelled with a locked outfall at the detailed design stage to understand whether sufficient storage has been provided to account for such an occurrence.

The application site drains surface water runoff to the Pevensey and Cuckmere Water Level Management Board drainage district. Therefore, the applicant should apply for consent to discharge surface water runoff into the Water Level Management Board's area as required by the Board's Byelaw 3, which is the process by which the Board agrees the proposed discharge rates.

Should consent be given it will be subject to the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy. This policy is available using the following link: https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf

Although the consenting process as set out under the Board's Byelaws is separate from the planning system, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that the application to discharge surface water runoff into the Board's watercourses is made to the Board prior to determination of a planning application which fixes the layout.

If the Local Planning Authority is minded to grant planning permission, the 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 QBAR

greenfield runoff rates for all rainfall events, including those with a 1 in 100 (plus climate change) annual probability of occurrence.

- b. The details of the outfall of the proposed drainage system and how it connects into the watercourse shall be submitted as part of a detailed design including cross sections and invert levels.
 - c. The detailed design shall include information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely.
 - d. The detailed design of the attenuation ponds shall be submitted to and approved in writing by the Local Planning Authority. The detailed design 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. In the event 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 shall be provided.
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.

3. 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.
4. 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.

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



Edward Sheath - Head of Planning and Environment
On behalf of Flood Risk Management ESCC and Pevensay and Cuckmere WLMB

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