



Your Ref: GK/LV8000

Our Ref: 332510180/2001/TAU/LD/ET/ASm

04 November 2021

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

Email only: graham.kean@wealden.gov.uk, claire.turner@wealden.gov.uk and planning@wealden.gov.uk

Dear Mr Kean

RE: Planning Application WD/2021/2198/MAO
Land at Bird in Eye Farm, south of Bird-in-Eye Farm, Uckfield

Introduction

Thank you for your comments provided to the Local Planning Authority (LPA) on 25 October 2021, which have been made available to Stantec as the Flood Risk & Drainage engineers working on behalf of the applicants. Following a review of your comments, Stantec would like to take this opportunity to address any queries and remove your recommendation for a holding objection.

Responding to the Issues Raised

The following letter will address any relevant points by directly quoting text from your commentary (in *italics*) and then immediately providing clarification (in blue text). If you require further information, we would be happy to discuss matters further, possibly via a virtual meeting, to expedite alleviating your concerns.

"Infiltration is the first recommended drainage method in the SUDS hierarchy and the underlying mapped geology of the site suggests that this may be a usable solution for this site. The infiltration potential would need to be confirmed by the on-site testing."

It was agreed with East Sussex County Council, as the Lead Local Flood Authority (LLFA) in a meeting on 05/05/20 and email on 21/08/20 (refer to Flood Risk Assessment (FRA) Appendix F) that infiltration testing would be undertaken at the Reserved Matters stage, to discharge a suitably worded condition. As such, the surface water drainage design was progressed assuming no infiltration. In any case, the proposed surface water drainage strategy utilises several SuDS features which could easily and simply be adapted to become infiltration features in the future.

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"It is surprising that having suggested, without testing, that an infiltration based system will not work on this site, the report then proposes to use permeable paving and filter strips which require infiltration to be truly effective. For the present purposes of calculation and until any tests are carried out, these can only be considered as storage, not disposal media."

Stantec agree with this statement. We have included these devices as Source Control measures that provide treatment and temporary storage of runoff upstream of the proposed basin. Should future infiltration testing be proven viable, these can easily be converted to infiltration devices with high-level overflow systems into the basin.

"The proposed drainage strategy is to discharge into a watercourse, in this case the Framfield Stream. However, paragraph 6.2.9 suggests that this discharge would be through an ancient woodland which is normally wholly unacceptable. It is recommended that the Council's arboricultural officers be asked to comment on this aspect of the application. The point of discharge would also be outside the red site boundary and would require a third party landowner permission to achieve over and above any planning permission which may be granted."

Stantec have worked closely with the project Arboriculturalist and Landscape teams to mitigate this discharge option (the only one available in lieu of infiltration testing). The proposed discharge route shown on Plan 48494/2002/SK01 in Appendix G of the FRA follows a route observed on site by the arboriculturalist as a small clearing in the canopy with more shrub-like density. Regarding the third party land, the red line boundary does in fact extend up to the top of bank of the watercourse and lies within the applicant's/site owner's control. Therefore, there will be no third party issues regarding delivery of this outfall

"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."

Stantec agree with this statement. The calculations provided in this FRA have been developed to these design standards up to a level of detail suitable for the outline application. These will be developed further in response to an anticipated suitably worded condition related to Reserved Matters on this site.

"It is stated that the surface water drainage system will be designed for adoption by Southern Water, although local experience suggests this is highly unlikely to occur and the site may have to be maintained for its lifetime by a site management company. As much as possible of the drainage system should be sited within public open spaces with adequate space for maintenance access. 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."

Stantec understand this position. We have liaised with Southern Water previously, but it was indicated that they would provide further comments following granting of outline consent for the proposed development. The applicant will continue to work with them to deliver an acceptable and adoptable surface water drainage system. Irrespective of the final maintenance party, the principle of locating as much of the surface water drainage system in public space with suitable access will be adhered to.

We trust the above information is sufficient to address your concerns and remove your recommendation for a holding objection, subject to the imposition of appropriately worded conditions as necessary. But as previously stated, please feel free to get in touch should you require further information.

Yours sincerely

Elisabetta Torricelli
on behalf of Stantec UK Ltd

cc: Claire Turner – Wealden District Council – Local Planning Authority (LPA)

Enclosures: Wealden drainage 25 10 21

My reference GK/LV8000

ask for Graham Kean

date 25 October 2021

MEMORANDUM

Mrs C Turner, Planning

Wealden District Council

**Council Offices, Vicarage Lane
Hailsham
East Sussex BN27 2AX**

website : www.wealden.gov.uk

your reference

Planning Application WD/2021/2198/MAO Land at Bird-in-Eye Farm, south of Bird-in-Eye Farm, Uckfield

I write further to your e-mail of 1 October 2021 regarding the above planning application and I would have the following comments.

Flood Risk

The site lies wholly within EA Flood Zone 1 so the sequential test is met and the exception test is not required for this site. The nearby areas in Flood Zones 2 and 3 alongside the watercourses described below are outside the site boundary. 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 site is at very low risk of flooding from surface water, with medium to high risk areas alongside the watercourses described below outside the site. There is no information on groundwater.

The Framfield Stream and the parallel Chalybeate Stream main rivers flow south to north just outside the western boundary of the application site. There is an unnamed ordinary watercourse which becomes a main river flowing east to west between the two halves of the site which has a chain of ponds along it. There is stated to be a further ordinary watercourse running parallel to this one along the field boundaries.

There are no records of flooding at or near this location within this Council's land drainage database.

The Geological Map states that the northern end of the site is on the Lower Tunbridge Wells Sand Formation of sandstones, siltstones and mudstones and the southern end of the site is on the Ashdown Formation of sandstones, siltstones and mudstones. Parts of the site adjacent to the Framfield Stream are overlain with Alluvial Deposits of clay, silt, sand and gravel.

Surface Water Drainage

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

Infiltration is the first recommended drainage method in the SUDS hierarchy and the underlying mapped geology of the site suggests that this may be a usable solution for this site. The infiltration potential would need to be confirmed by the on-site testing.

The outline drainage scheme shows roof and road water being conveyed to an attenuation pond in the south-west corner of the site, for the most part by a conventional piped system but with some swales as well.

It is surprising that having suggested, without testing, that an infiltration based system will not work on this site, the report then proposes to use permeable paving and filter strips which require infiltration to be truly effective. For the present purposes of calculation and until any tests are carried out, these can only be considered as storage, not disposal media.

The proposed drainage strategy is to discharge into a watercourse, in this case the Framfield Stream. However, paragraph 6.2.9 suggests that this discharge would be through an ancient woodland which is normally wholly unacceptable. It is recommended that the Council's arboricultural officers be asked to comment on this aspect of the application. The point of discharge would also be outside the red site boundary and would require a third party landowner permission to achieve over and above any planning permission which may be granted.

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Notes

Provision of the foul sewage arrangements is for Southern Water to comment on.

Any new connection to an existing watercourse will require a consent over and above any planning permission which may be granted from the Lead Local Flood authority for an ordinary watercourse or the EA for a main river.

Conclusion

In my opinion, the surface water information provided within this application is not adequate for this application and I would therefore **object** to this application on surface water grounds. With the present state of knowledge there is no guaranteed way of finally disposing of the site surface water, which either requires tests to prove infiltration potential or permission to use third party land and to pass through an ancient woodland.

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

Graham Kean
Engineer and Countryside Officer