My reference GK/LV8000

ask for Graham Kean

date 26 November 2021

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

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MEMORANDUM

Mrs C Turner, Planning

your reference

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

I write further to your e-mail of 18 November 2021 regarding the above planning application and I would have the following comments. I previously commented on this application on 25 October 2021. This memorandum is in reply to the applicant's response of 17 November 2021.

Flood Risk

As previous.

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.

The proposed drainage strategy is to discharge into a watercourse, in this case the Framfield Stream. However, this discharge would be through an ancient woodland which is normally wholly unacceptable and I note from your e-mail of 18 November 2021 that this is the case here.

This now leaves infiltration as the other possible drainage method for the site and the option of progressing the design assuming no infiltration seems to have been overtaken by events. In this respect, the advice from the LLFA meeting must also carry less weight as this is now the main potential way of disposing of the water.

This 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. If this testing is left until a later stage of the planning process, this would run the risk of obtaining an outline permission which could not then be implemented if the infiltration results turned out poorly.

In regard to adoption, I can only reiterate that Southern Water have yet to adopt any SUDS scheme within the Wealden area since the legislation came into force in 2015. If the applicant wishes to follow the adoption route then ICOSA may prove a better partner. 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; along with the formation of a Management Company or written evidence that adoption is to occur.

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.

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

I would still wish to see the infiltration option confirmed at this stage of the planning process. However, if you wish to grant permission for this application without these results, 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:
>
> i. Supply detailed plans, layouts and sections of the proposed drainage system and pollution/silt control and water cleansing devices and construction details of any non-standard features.
>
> ii. Provide a full management and maintenance plan for the development which shall include written confirmation of adoption or 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. Provide proof by means of site specific testing to BRE Digest 365 that sufficient infiltration potential exists to serve the site and that the soakage devices have been designed in accordance with the real soakage rates obtained from the tests.

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