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Date: 6 October 2020

Our ref: SUD/ES/20/005
Your ref: RR/846/CM

Dear Benjamin Brett

SUD/ES/20/005 - Construction of vehicle service depot with associated landscaping and construction of a lorry strapping shed on a separate site, Mountfield, Robertsbridge, TN32 5LA

Received Date: 10 September 2020

Position of the Lead Local Flood Authority:-

No objection	The information provided is satisfactory and enables the LLFA to determine that the proposed development is capable of managing flood risk effectively.	
No objection	The information provided is satisfactory and enables the 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 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 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:

The applicant is proposing to discharge surface water runoff to a culverted section of the River Line which runs beneath the application site. Any works affecting the watercourse beneath the development site will have to be discussed and agreed to by the County Council. The applicant should approach the LLFA for discussions once the nature of these works is known on watercourse.consenting@eastsussex.gov.uk

We note that the proposed building is in close proximity to the watercourse. We recommend 5m between watercourses and proposed buildings unless it can be demonstrated that there is sufficient space left to allow for the maintenance and future replacement of the culvert. Care should also be taken during construction to ensure there is no damage to the culvert and the steps taken to ensure this should be outlined in the construction management plan. The route the culvert takes beneath the site does not appear to be consistent on the plans provided and we request that further investigation is carried out to understand the exact location of the culvert.

It is proposed that surface water runoff will be attenuated in underground attenuation crates. We require that consideration is given to the use of open attenuation features such as ponds and swales which are easier to maintain and provide additional biodiversity and amenity benefits over the attenuation crates currently proposed.

British Geological Survey data indicates that the groundwater levels beneath the site could be less than 3m below ground level. Groundwater monitoring should be undertaken between the months of September and April to understand the maximum groundwater levels beneath the site and how this will affect the attenuation available at the site.

Nevertheless, it is felt that flood risk from the proposed development can be managed within the proposed 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 3.5 l/s 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 culverted watercourse shall be submitted as part of a detailed design including cross sections and invert levels. Further investigation into the exact location of the culverted watercourse beneath the site should also be carried out. The exact location of the culvert shall be shown on the drainage drawing.
 - 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 surface water drainage features (underground tank) shall be informed by findings of groundwater monitoring between autumn and spring at the location of the proposed attenuation features. 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
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 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. We also require that the construction management plan sets out measures to the protect the culverted watercourse during the construction phase.
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 contac the case officer on SUDS@eastsussex.gov.uk

Yours sincerely

Nick Claxton

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