East Sussex
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Communities Economy and Transport

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Mr M Cathcart
Rother District Council
Town Hall
Bexhill-on-Sea TN39 3JX

Date: 27.04.17

Dear Mr Cathcart

SUD/RR/2017/011 - Erection of 98 no. residential dwellings (Use Class C3), non-residential floorspace comprising 280 sqm (Use Class A3) and 920 sqm (Use Class B1), and associated access, car/cycle parking

Location: Hodson's Mill, Northbridge Street, Salehurst/Robertsbridge TN32 5NY

Planning Application Reference: RR/2017/382/P

Received Date: 3 April 2017

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.	
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	**X**
Objection	The application presents an unacceptable on site/off site flood risk.	

Cont./…

Detailed Comments:

Some parts of the development site are within Flood Zone 3 associated with the River Rother. The supporting Flood Risk Assessment and Drainage Strategy (FRA) states that Catchment C (as demarcated by the FRA) of the proposed development is located within Flood Zone 3. It also acknowledges that during a 1 in 100 (including a climate change allowance) the whole catchment will be under water. Therefore proposed permeable pavement will not be able to store surface water runoff from the development since it will be overwhelmed by water from the river. Consequently, overland surface water flows to surrounding areas such as Northbridge Street are likely to increase and increase flood risk.

In addition the required surface water storage will be provided through permeable pavement with 1.5m deep sub-base on the southern car park. Such depth of the sub-base storing runoff appears to be too excessive and is most likely to have implications on the structural integrity of the system. Therefore other methods of storing surface water runoff from this catchment should be considered.

The FRA and the supporting hydraulic calculations for Catchment B shows that the proposed drainage network will have a flooded volume of $24m^3$ during a rainfall event with a 1 in 100 (plus climate change) annual probability of occurring when the outfall is surcharged during high river levels. Although the FRA states that the flooded volume will be stored within the proposed highway, there is no evidence to show that this is possible without increasing flood risk on or offsite. There is also no detail of what design actions will be undertaken to ensure that the flood water will indeed be stored on the proposed highway.

British Geological Survey data indicates that groundwater water level on site is less than 3m below ground level. The cellular storage tank which is proposed to manage surface water runoff from Catchment A will most likely be within groundwater. Consequently, groundwater is most likely to affect the hydraulic capacity and the structural integrity of the cellular storage tank if measures to manage the impacts of groundwater are not implemented. In addition the surface water outfall from the cellular storage tank is most likely to be surcharged during periods of high river levels, reducing the potential of the drainage system to empty. This is most likely to increase the risk of flooding of the surface water system if the impacts of high river levels are not taken into account during the design of the system. Consequently the risk of flooding on or offsite is most likely to increase.

The applicant should submit additional information addressing the above mentioned issues to assure us that the proposed development will not result in increased flood risk on or offsite.

If you or the applicant/agent wishes to discuss this position with me, please contact the case officer on SUDS@eastsussex.gov.uk.

Yours sincerely

James Harris

Assistant Director – Economy

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