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**SALEHURST & ROBERTSBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN**  
December 2017

Examination by Mr Slater for a Public Hearing on 28<sup>th</sup> September 2017

**Question 4**

**Is the use of SUDS an acceptable mitigation measures for river flooding as suggested by the Plans Environment Report? Are there any site-specific mitigation measures to ensure the development remains safe throughout its lifetime?**

Responses prepared by Courtley Planning Consultants Ltd on behalf of Devine Homes (September 2017)

#### Question 4:

4.1 The use of SUDS focusses on management of water runoff from a development site rather than specific uses to mitigate against existing river flooding on a site.

4.2 Below is an extract from the East Sussex County Council LLFA response to the planning application on the Mill site.(RR/2017/382/P). The following detailed comments were submitted by James Harris on the 24<sup>th</sup> April 2017.

*Some parts of the Mill site fall within Flood Zone 3 associated with the River Rother. The supporting FRA and Drainage Strategy (FRA) state 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 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 St are likely to increase and increase flood risk.*

*The proposed 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<sup>3</sup> during a rainfall event with a 1 in 100 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 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. Consequentially, 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 taken into account during the design of the system. Consequently the risk to flooding on or offsite is most likely to increase.*

4.3 The use of SUDS is not an acceptable mitigation for river flooding as suggested by the Plans Environment Report. There are also no suitable mitigation measures that would ensure the development remains safe throughout its lifetime.