

Our Ref: 881964 L01 NE  
Planning App: RR/2021/1656/P

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10<sup>th</sup> January 2022

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Ms C Gibbons

Via Email

**RE: Fryatts Way - Land at Bexhill - Erection of up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting & landscaping, informal public open space & children's play area, surface water flood mitigation, vehicular access point & assoc. ancillary works. AMR with the exception of the main site access.**

I refer to the recent Natural England consultation response dated 9<sup>th</sup> November 2021 to the above application. This response requests further information on a number of points specifically relating to the SuDS strategy and flood risk, which this letter aims to address and clarify.

Natural England comment	RSK Response
Natural England acknowledge that the applicant has proposed the use of SuDS, in order to mitigate the increase in surface water run-off as a result of the development. We also acknowledge that, as noted within the applicant's Flood Risk Assessment & Outline Surface Water Drainage Strategy (June 2021), all surface water run-off is proposed to pass through a treatment train of at least two SuDS features, prior to discharge from the site, and that this preliminary strategy has been designed following the guidance in the CIRIA SuDS Manual (2015). Natural England advise that this appears to be a potentially suitable mitigation strategy.	A drainage strategy drawing has been produced as part of the submitted FRA. It can be confirmed that all surface water run-off will pass through at least two levels of treatment prior to discharge off the site. The SuDS elements being proposed incorporate; permeable paving, swales and an attenuation basin. It can be seen from the drainage strategy drawing that the development parcels are enclosed by swales which would receive the run-off prior to discharge to the basins. A further swale could be incorporated between the basin outlet and the receiving watercourse. The planting of these swales can be agreed with Natural England and the LLFA to ensure maximum pollution removal potential can be reached prior to discharge to the receiving watercourse.
However, it is currently unclear as to exactly which SuDS features are to be included. For example, the Flood Risk Assessment & Outline Surface Water Drainage Strategy suggests the use of permeable paving, swales and attenuation basins, while the Shadow HRA (April 2021) considers swales and attenuation basins only. While only two treatment stages are necessarily required, the current information leads to uncertainty as to which features will be used and how they will be implemented to form a treatment train.	As outlined above and on the drainage strategy drawing, the scheme will incorporate (as a minimum), permeable paving, swales and an attenuation basin. Full details of the drainage will follow at detailed design stage and this can be secured through an appropriately worded planning condition, with the full details being submitted to and approved by the LLFA prior to commencement.
In addition, there appears to be some uncertainty as to the groundwater levels on the site. According to the response from the Pevensy and Cuckmere Water Level Management Board (October 2021), the	The basins have been preliminarily designed based on a depth of 1.2m for the southern basin and 1.5m for the northern, above the estimated groundwater levels. It is proposed that groundwater monitoring be

<p>proposed SuDS basins appear to be in areas that have groundwater levels at less than 2m below ground level. High groundwater levels could have implications for the efficacy and durability of the proposed SuDS. The SuDS design should be informed by accurate groundwater monitoring. Alternatively, in the absence of accurate groundwater data, your authority should determine if the SuDS design has been based on a worst-case scenario, where groundwater levels are at or near the surface. If this is determined to not be the case, Natural England advise that avoidance of Adverse Effect on Integrity will not be sufficiently certain. Natural England reiterate that the proposed mitigation measures must be sufficiently certain to be considered by the competent authority at Appropriate Assessment.</p>	<p>carried out in the location of the basins to allow the design to be confirmed. Should groundwater levels be elevated in this area, a technical solution will be proposed. This could require the basins to be lined to prevent groundwater ingress which could compromise the volume of the basins.</p>
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Based on the above comments and the data submitted as part of the Flood Risk Assessment, we do not believe there to be sufficient grounds for an objection. Further drainage strategy work is required to develop the scheme at detailed design stage. We would therefore be seeking a suitably worded planning condition to secure the detailed drainage design which would be required at full application stage.

We trust this information is sufficient for your immediate needs, however please do not hesitate to contact the undersigned if you require any further information.

Yours sincerely

**RSK LDE LIMITED**



**Colin Whittingham**

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