



DRAINAGE & FLOOD RISK CONSULTATION

PROJECT: An application for planning permission for a clay quarry and construction materials recycling facility (CMRF) for CD&E wastes including the use of an existing access from Loxwood Road, the extraction and exportation of clay and restoration using suitable recovered materials from the CMRF to nature conservation interest including woodland, waterbodies and wetland habitats.

Reference: WSCC/030/21

Revisions:

Date: 12 August 2021

Recommendation: More Information Required

Reference:

- A. Lead Local Flood Authority Response to Scoping Report for Loxwood Clay Pits dated 21 Feb 20.

1 INTRODUCTION

- 1.1 West Sussex County Council (WSCC) Lead Local Flood Authority (LLFA) has been consulted on the above proposed development in respect of drainage & flood risk.
- 1.2 The LLFA assesses this proposal in line with the adopted West Sussex LLFA Policy for the Management of Surface Water:
https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf
- 1.3 The Lead Local Flood Authority (LLFA) commented on an earlier Scoping Report for Loxwood Clay Pits in February 2020 (Reference A).

1 FLOOD RISK

- 1.4 The LLFA concurs with the assessment of flood risk set out in the Environmental Statement.

2 SURFACE WATER

- 2.5 The LLFA has insufficient information upon which to assess the management of surface water to ensure compliance with local and national policy.
- 2.6 No detailed drainage strategy has been provided for this proposal. The site plan shows a site building of approximately 35m x 40m but there is not accompanying drainage strategy. A drainage strategy compliant with the LLFA Policy for the management of surface water should be submitted that needs to quantify all additional impermeable areas for the site (buildings and any hardstanding impermeable areas) and demonstrates that attenuation is being provided to ensure no run-off exceeds greenfield rates.
- 2.7 While reference is made in the water chapter (paras 4.49-4.51) to the comments made by the LLFA in Reference A, these do not appear to have been adequately addressed anywhere in the EIA. Specifically, the LLFA requires the applicant to demonstrate through a detailed Drainage Strategy how the approach being taken with regard to tree removal and stripping of topsoil would safeguard against any increases in surface water flow routes from the Development area to the downstream catchment. This is particularly during the early phases of the development. While reference is made to a surface water management system in paragraph 6.1.5 no details of this system could be located.
- 2.8 Paragraph 7.1.2 states: *The construction of a small fishing pond may allow the balancing of additional water during storm events which may serve to improve the existing situation.* This proposal is welcome and, strategically placed, such a fishing pond may contribute to the alleviation of flood risk downstream. It would be welcomed if this could form part of the Restoration plan as commitment to work with the LLFA to explore the multi-functional benefits of such a proposal including reduced flood risk.

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