I have previously made comments on the Plan in my capacity as

Chairman of the Cuckmere Flood Forum since 2001.

Chairman of Hellingly Parish Council since 1990 and

As an owner and farmer of land both in the Pevensey Levels and in the Cuckmere Valley since 1986.

I am therefore very conversant with the underlying geology of the area and of the flooding events that have occurred over many years.

The Cuckmere River is a flash river subject to tidal block where the water level can rise several feet in a matter of hours and where once the river has overtopped the resultant flood water remains in the valley until the tide has turned. Because of its essentially rural nature with no significant housing developments there is very little record of surface water flooding as farmers have tended not to notify flood authorities of flooded fields. However with significant new housing proposed on green field sites this lack of evidence means that there should be a closer examination of potential flood risk than a desk based study reliant solely upon reported incidents of flooding.

The area around Hailsham that is identified in the plan for the majority of the growth in the District (The South Wealden Super Growth Area or SWGA) is for the most part an area at high risk of flooding from all sources (fluvial, groundwater and pluvial) and affects, and is affected by two major environmental features namely the Pevensey Levels and the Cuckmere river.

Surface water from the area drains either to the Cuckmere or to the Pevensey Levels. Both are in part SSSI sites with the Levels an international RAMSAR designation. The ecology of both should therefore be a significant consideration in planning determinations.

Previous strategic flood risk assessments undertaken as part of the preparation of earlier Local Plans together with more recently completed flood management and surface water management plans all acknowledge the flood risks associated with the area. In the past the Environment Agency has tended to concentrate on fluvial flood risk defining the areas at risk as within flood Zones 1 2 or 3 and determination of where to allocate land for future development has been based primarily if not exclusively upon the fluvial flood zones alone. However more recently the importance of other sources of flood risk has been recognised and changes have been made to the NPPF to reflect the importance of other potential flood risks and not just that from fluvial flood.
Previously the requirement to undertake the sequential test was not deemed necessary if a proposed site was within flood Zone 1. The recent changes however now require regard to be taken of the potential risk from all forms of flooding (See paragraph 156 NPPF 2018) and for a sequential approach to be applied where there is risk of flooding from all sources and not just fluvial. The changes also require an assessment to be made with the object of avoiding the potential increase to flood risk elsewhere from a proposed development (see paragraphs 163 and 155 NPPF 2018)

The Strategic Flood Risk Assessment relied upon for the purposes of the development allocations in the Plan is little more than a desk top study (see Chapter 5 Page 23of the Strategic Flood Risk Assessment) based upon insufficient and inaccurate records and as such renders the Plan as unsound as not being Justified.

The history of fluvial flooding paragraph 6.1 page 25 contains significant inaccuracies in the recorded incidents of fluvial floods of the Cuckmere River. The river regularly overtops and Alfriston, Arlington and Hellingly have all suffered considerably more fluvial flood events than those shown in the table of fluvial flood events. Confirmation of the number and frequency of flood events can be obtained from the respective Parish Councils and from the Cuckmere Flood Forum

It is apparent from diagram 3.2 page 16 that no sequential testing of potential sites for development against flood risk from sources other than fluvial was undertaken as the sites all fell within fluvial flood zone 1

See also the comments below taken from the Executive Summary

This assessment highlighted the sites entirely within Flood Zone 1. These sites were sufficient to meet the housing targets for the Wealden District. As a result, no Level Two SFRA assessment was required.

and

A total of 725 sites within the Wealden District were identified from the Strategic Housing Land Availability Assessment (SHLAA) call for sites process. These 725 sites were screened against a suite of available flood risk information and spatial data to provide a summary of risk to each site. This assessment highlighted the sites entirely within Flood Zone 1. These sites were sufficient to meet the housing targets for the Wealden District. As a result, no Level Two SFRA assessment was required.

Accordingly it is submitted that the Plan is unsound and the planning authority should be asked to complete a thorough and in depth Strategic Flood Risk Assessment to support development allocations in the South Wealden Super Area.

David G White
Chairman Cuckmere Flood Forum
Chairman Hellingly Parish Council
Wealden District Councillor Hellingly Ward
07.05.19