Land South of Barrow Green Road, Oxted

PINS Ref: APP/M3645/W/25/3372747

# Drainage Proof of Evidence

**Prepared by**
**Neil Jaques BEng (Hons) MCIWEM MCIHT**

For

Croudace Homes Limited

Rev: Final
December 2025

motion

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# Contents

# 1.0 Qualifications and Experience

1.1 My name is Neil Jaques. I hold a Bachelor of Engineering with Honours in Civil Engineering from Kingston University and I have over 24 years of experience in Civil Engineering. I am a member of The Chartered Institution of Water and Environmental Management (MCIWEM) and The Chartered Institution of Highways and Transportation (MCIHT).

1.2 I am currently a Board Director, and a Director of the Water Team at Motion Consultants Limited and I have been at Motion for the past 15 years. Prior to Motion I was an Engineer at WSP for over nine years.

1.3 For most of my Civil Engineering career I have specialised in flood risk and drainage, which has involved advising private clients on flood risk and drainage matters. This has included preparation of Flood Risk Assessments (FRA), Surface Water Drainage Strategies and Sustainable Drainage System (SuDS) Assessments, to support new residential and commercial developments at the planning stages. Also, I have carried out the detailed design of foul and surface water drainage for new developments. Additionally, I have worked for public sector clients to investigate flooding issues and design solutions to overcome the flooding problems.

1.4 The evidence which I have prepared and provide for this appeal reference APP/M3645/W/25/3372747 in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions.

## 2.0 Introduction

2.1 The development site, encompassing approximately 9.7 hectares, is situated within the jurisdiction of Tandridge District Council (TDC), with Surrey County Council (SCC) acting as the Lead Local Flood Authority (LLFA).

2.2 The site is located to the north-west of Oxted and is bound by Barrow Green Road and a railway line to the north, a cemetery to the east, a residential development to the south and a stream and woodland to the west.

2.3 Motion was initially instructed by Croudace Homes Limited in April 2024 and site visits were carried out in May 2024 and September 2024.

2.4 During the first site visit a spring feature was identified in the west of the site.

2.5 Ground investigations comprising of trial pits and boreholes were carried out in November 2024 and December 2024, respectively. With groundwater monitoring in the boreholes carried out into January 2025 (Ref: CD1.22.U Appendix D). The boreholes were installed in the vicinity of the spring and the monitoring predominantly showed that groundwater levels were at, or close to the surface during the monitoring period. The trial pits covering the wider site showed that no groundwater was encountered.

2.6 Further trial pitting was then carried out in the vicinity of the spring in February 2025 (Ref: CD1.22.U Appendix D).

2.7 Also, as part of the preliminary desk based study investigations, it was identified that the site was shown to be subject to surface water flooding. Therefore, Ardent was instructed to carry out surface water flood modelling to set a baseline position and prepare a post-development modelling scenario.

2.8 An outline planning application was submitted to Tandridge District Council (TDC) in April 2025 (Planning Ref: 2025/245) for development proposals comprising:

*Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access.*

2.9 A Flood Risk Assessment (FRA) and Drainage Strategy was prepared in February 2025 (Ref: CD1.22.U) and was submitted in support of the planning application.

2.10 The FRA was supported by a Hydraulic Modelling Report (Ref: CD1.22.U Appendix D) prepared by Ardent and was included as an appendix in the FRA.

2.11 SCC as the Lead Local Flood Authority (LLFA) initially objected to the proposals in July 2025 (Ref: CD3.2J). The following table provides a chronology of events following the LLFA's initial objection.

| Event | Date |
|---|---|
| LLFA Objection (Ref: CD3.2J), for the following reason:<br><br>*The proposed surface water drainage scheme does not meet the requirements set out in the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems.*<br><br>The letter from the LLFA requested further information on 12 specific points, as summarised below:<br><br>1. More details of the diverted overland surface water flood flow route.<br>2. Further details of the drainage strategy with regard to infiltration and discharge to the ordinary watercourse.<br>3. Confirmation of groundwater levels and potential implications on utilising infiltration.<br>4. Provide reason for the two outfalls and proposed discharge rates, and provide evidence showing the receiving watercourse has onward connectivity, has capacity for site flows, and a gravity connection can be achieved.<br>5. Watercourse should be clearly shown on the drawing, including bed and bank levels.<br>6. It is not clear if the watercourse is within the western boundary of the site.<br>7. Evidence must be provided to establish the greenfield runoff rate for the site.<br>8. On site attenuation should be provided for the 1 in 100 year + 45% allowance of climate change the site, up to and including the 1 in 30-year rainfall event including allowance for climate change, and the surface water up to the 1 in 100-year event including allowance for climate change must be safely contained on site. However, the results are showing FLOOD for those events.<br>9. The proposed SuDS set out in the FRA should be included and labelled on the drainage strategy drawing.<br>10. No evidence has been provided to demonstrate that exceedance events have been considered.<br>11. Any proposed flow control device should be included in the drainage plan including discharge rates.<br>12. It is understood that there is a watercourse adjacent to the redline boundary of the site, future riparian access and maintenance should be considered within the design and detailed in the maintenance plan. | 08/07/2025 |
| Motion contact LLFA to arrange meeting | 08/07/2025 |
| LLFA respond with dates for meeting | 09/07/2025 |
| Meeting with LLFA<br><br>A draft Technical Note 3 was tabled at the meeting covering the 12 main points highlighted above and each point was discussed in turn.<br><br>The LLFA agreed to review the draft Technical Note 3. | 15/07/2025 |
| Draft Technical Note 3 issued to LLFA | 17/07/2025 |
| LLFA confirmed Technical Note 3 is acceptable | 23/07/2025 |

| | |
|---|---|
| Final Technical Note 2 issued (Ref: CD2.13)<br><br>The final Technical Note 2 addressed each of the 12 points above and below is a summary of Motion's responses to each of the points.<br><br>1. It clarified that the surface water flood model development platform, conveyance route, ground levels and peak surface water flood depths and levels were included in the Ardent hydraulic modelling. Motion provided an updated drainage strategy drawing showing the surface water flood model development platform, conveyance route and peak surface water flood levels and including a note clarifying development platform and finished floor level requirements.<br>2. The Technical Note set out the principles of the drainage strategy with regards to infiltration and discharge to the watercourse.<br>3. It confirmed that ground investigations were included in Appendix F of the FRA (Ref: CD1.22.U) and set out the assumptions with regards to groundwater levels.<br>4. This section made reference to paragraphs 2.9 to 2.11 of Technical Note 2, which clarified that two outfalls are required due to the site topography and the location of the spring. It also confirmed that the discharge rate in the original drainage strategy was based on controlling runoff to the existing greenfield runoff rate for QMED (a return period of 1:2 years), but was now updated based on a Staged Discharge Approach, using greenfield runoff rates for the 1 in 2, 1 in 30 and 1 in 100 storm events as appropriate.<br>5. The Technical Note confirmed that the drainage strategy drawing was updated to clearly show the watercourse.<br>6. As per point 5 above, the drainage strategy drawing was updated to clearly show that the watercourse is within the boundary of the site.<br>7. The Technical Note confirmed that the drainage strategy was now updated based on a Staged Discharge Approach, using greenfield runoff rates for the 1 in 2, 1 in 30 and 1 in 100 storm events as appropriate.<br>8. It confirmed that the hydraulic calculations were updated to show no flooding for the 1 in 30 year event and other minor changes were made to the hydraulic modelling, partly as a result of the revised Staged Discharge Approach using greenfield runoff rates for the 1 in 2, 1 in 30 and 1 in 100 storm events as appropriate.<br>9. Additional labels were added to the drainage strategy drawing showing the proposed SuDS.<br>10. The Technical Note clarified that the original FRA and Drainage Strategy included details of the site levels and exceedance flow arrows and confirmed that any further work required in this regard can be conditioned and/or demonstrated at the reserved matters stage.<br>11. It confirmed that the flow control chambers were now annotated with 1 in 2, 1 in 30 and 1 in 100 greenfield runoff rates in the updated drainage strategy drawing. | 24/07/2025 |

| | |
|---|---|
| 12. An updated Drainage Management and Maintenance Plan was provided which included maintenance requirements for the receiving ordinary watercourse flowing through and adjacent to the application site. | |
| The LLFA removed their objection subject to conditions (Ref: CD3.2J)<br>The letter from the LLFA confirmed that they'd removed their objection and proposed two conditions.<br>The first condition requires submission of a final design of the surface water drainage system, prior to commencement of the development.<br>The second condition requires a verification report is submitted prior to first occupation, to demonstrate that the surface drainage system has been constructed as per the agreed scheme. | 04/08/2025 |

**Table 2.1 – LLFA Chronology of Events**

2.12 Following the consultations with the LLFA and the preparation of Technical Note 2 (Ref: CD2.13) in response to their objection, the LLFA removed their objection in August 2025 (Ref: CD3.2J), and proposed two conditions to be discharged at the Reserved Matters stage.

## 3.0 Scope of Evidence

3.1 Planning permission was refused in August 2025. The Decision Notice (CD3.3) in relation to the refusal of planning permission lists nine reasons for refusal. I consider that reason for refusal number four relates to drainage and the potential impact on The Bogs Ancient Woodland (AW), as follows:

*The applicant has not demonstrated that the proposed development, and in particular the outline drainage proposals, will not result in the loss or deterioration of an irreplaceable habitat both on-site and off-site, that is The Bogs ancient woodland, within and adjoining the site boundary. This is contrary to NPPF 2024 paragraph 193 (c) which requires that such development should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. The proposal is also contrary to Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP7 which requires that proposals protect and, where opportunities exist, enhance valuable environmental assets. The proposal is similarly contrary to Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP19 which provides that where a proposal is likely to result in direct or indirect harm to an irreplaceable environmental asset of the highest designation, such as ancient woodland, the granting of planning permission will be wholly exceptional, and in the case of ancient woodland exceptions will only be made where the need for and benefits of the development in that location clearly outweigh the loss, and that impact or loss should not just be mitigated but overall ecological benefits should be delivered.*

3.2 TDC has detailed Key Issues in their Statement of Case (Ref: CD7.1) which highlights three key issues relating to surface water drainage and foul water drainage, for which I have included extracts below:

***Key issue 6: The implications of the proposed development for biodiversity, including The Bogs Potential Site of Nature Conservation Interest and ancient woodland.***

*Surrey Wildlife Trust, which will be providing an expert witness to appear on the LPA's behalf at the appeal inquiry, considers that the information with the application is insufficient to enable a full assessment of the ecological impacts. This is because the advice from the LPA's hydrological consultant, Hydro-GIS, is that an insufficient assessment of hydrological impacts of the proposed development has been carried out. The assessment of hydrological impacts is particularly relevant to impacts on The Bogs AW and wet woodland in the south west corner of the site. The hydrologist's evidence will detail what the assessment should provide, that is developing a conceptual hydrological model of the Bogs and wet woodland, and in particular showing the importance of the contribution of flow from the development site.*

***Key issue 9: Surface Water flood risk***

*The LPA accepts that with the exception of continuity of surface water runoff to feed The Bogs AW and pSNCI, the provisions of the NPPF and Tandridge Local Plan Part 2 Detailed Policies (P2DP) policy DP21(E) with respect to surface water flood risk are satisfied and this is a matter that attracts neutral weight in the planning balance.*

*The LPA, however, continues to have a number of unresolved concerns about the applicant's surface water drainage strategy specifically related to potential adverse impacts on The Bogs AW and pSNCI within and adjacent to the site as set out in Section 13 above.*

3.3 It is considered that the key issues primarily relate to an ecological issue, relating to the potential hydrological impact on The Bogs Ancient Woodland. Therefore, this proof should be read together with the proofs prepared by the Appellants other consultants, The Ecology Partnership on Ecology (Ref: CD6.6) and Ardent in relation to Hydrology (Ref: CD6.8).

***Key issue 10: Foul Water Drainage***

*The LPA considers that the information provided by the applicant leaves unanswered questions. What is not clear is whether there is inadequate capacity in the foul sewer for any part of the proposed*

*development to be connected, or whether some development could be connected then occupied before all capacity was used up. A letter provided from Southern Water refers to.*

*"The proposed development would increase flows to the public sewerage system which may increase the risk of flooding to existing properties and land.".*

*The letter also refers to capacity to connect drainage for 50 dwellings to the current sewage system as assessed in June 2024 but this information could only be relied upon for 12 months. The Southern Water letter further states that:*

*"Southern Water has a duty to provide Network capacity from the point of practical connection (point of equivalent or larger diameter pipe) funded by the New Infrastructure Charge. Southern Water aim to provide this within 24 months following the date that planning has been granted for developments not identified as strategic sites in our current business plan. Strategic sites are larger developments and will often take longer than 24 months for a full solution to be provided."*

*Clarification is therefore required (and has been sought but not yet forthcoming) whether the proposed development is a 'strategic site' for Southern Water purposes in which case there would be uncertainty when a foul drainage connection would be available. The LPA have raised all these points of uncertainty with the appellant and further information is awaited.*

3.4 I consider the above matters in the following sections of my evidence and demonstrate that the development will not have any significant hydrological impacts on the AW and The Bogs pSNCI, resulting from the proposed surface water drainage strategy. My evidence also sets out how foul sewerage capacity can be delivered by 2030.

# 4.0 Policy

4.1 Relevant local and national planning policies are discussed below.

## National Planning Policy

4.2 National planning policy is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Chapter 14 and paragraphs 181–182 require sustainable drainage systems that enhance water quality, biodiversity, and amenity.

4.3 The site's surface water drainage uses SuDS to improve water quality, increase biodiversity, and enhance amenity, therefore meeting the requirements of the NPPF.

## Tandridge Local Plan Part 2: 2014-2029 (adopted Version July 2014)

4.4 Policy DP21 of the Tandridge Local Plan addresses Sustainable Water Management, with the objective of safeguarding water resources, improving ecological conditions, and ensuring flood risk is managed in a sustainable manner consistent with national policy.

4.5 The policy states that SCC acting as the LLFA is the Local Approving Body for SuDS on new developments.

4.6 The development proposals incorporate SuDS to ensure that the water quality from the site is maintained and runoff from site is restricted to the pre-development greenfield runoff rate. Therefore, the proposals are compliant with Policy DP21.

# 5.0 Surface Water Drainage Impacts

5.1 Key issues six and nine relate to the potential hydrological impacts, resulting from continuity of flow into The Bogs AW.

5.2 SCC as the LLFA removed their objection (Ref: CD3.2J) to the proposed development and stated the following:

*We are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to our advice below.*

5.3 The reasons for refusal have been reviewed by Motion and Ardent, and are addressed in the following technical notes:

Motion – Appeal Technical Note 3: FRA and Surface Water Drainage Strategy (Ref: CD2.14).

Ardent – Hydraulic Modelling Note (Ref: CD2.14 Appendix C).

5.4 The catchment area draining through the site to The Bogs during rainfall events is 0.11km$^2$, which represents just 7.5% of the total 1.46km$^2$ catchment area (Ref: CD2.14 Appendix C Figure 1-2) draining to The Bogs during rainfall events.

5.5 Following consultation with the LLFA it was agreed that the runoff rates from the proposed site would be controlled to match the existing greenfield runoff rates for the Q1, Q30 and Q100 storm events. These rates are confirmed in the technical note prepared by Motion in response to the LLFA objection (Ref: CD2.13).

5.6 The revised surface water drainage strategy included in Technical Note 2 demonstrates that the existing greenfield rates can be achieved by utilising flow controls and SuDS to balance the flows leaving the site.

5.7 The updated hydraulic modelling report (Ref: CD2.14 Appendix C) was carried out in response to the reason for refusal. The updated report includes modelling of the impacts on The Bogs during higher frequency, lower magnitude storm events, and also changed the methodology for surface flows originating from the site. The latter was to allow for a more accurate representation of flows entering The Bogs from the site, now that a variable discharge rate was being utilised to represent greenfield runoff from the site.

5.8 The revised hydraulic model was run for the pre- and post-development scenarios for the following storm events:

1 in 1-year

1 in 2-year

1 in 5-year

1 in 10-year

1 in 30-year

1 in 100-year

1 in 100-year plus 45% for climate change

5.9 The updated modelling shows that the proposed development will have a negligible impact on flows within The Bogs during the modelled range of storm events (Ref: CD2.14 Appendix C Table 3-2).

5.10 This confirms that using a variable discharge rate to control flows to greenfield rates will have a negligible impact on the flows and therefore a neutral impact within The Bogs.

5.11 The spring onsite represents the emergence of groundwater at the low point of the site. Preliminary investigations showed that groundwater in this area from December through to January was close to, or in some cases, above the ground surface within the wetted area (Ref: CD1.22.U Appendix D). Additional trial pitting carried out in February 2025 demonstrated that as you move away from the wetted area the depth to groundwater increases corresponding with the change in ground levels (Ref: CD1.22.U Appendix D).

5.12 The wetted area was mapped out on the Surface Water Drainage Strategy, and the proposed buildings are set back by 10 metres from the wetted area. Additionally, it is proposed that the development platform is set between 0.7m – 1.0m higher than existing levels in the southwest of the site (Ref: Ref: CD2.14 Para 4.4).

5.13 Ground investigations to date have been limited, because the existing site is agricultural land, which is still being actively farmed. However, the LLFA accepted that further testing could be dealt with via a condition, as per the LLFA Consultation Letter (Ref: CD3.2J). As part of the LLFA's consultation response it contains an informative stating that "*Sub ground structures should be designed so they do not have an adverse effect on groundwater*".

5.14 In the UK it is not uncommon to consider groundwater when designing below ground structures and, therefore, in my opinion, this is a matter that can be dealt with at the detailed design stage and informed by a full site investigation.

5.15 The attenuation features on the site have been designed to provide temporary storage during extreme rainfall events and allow surface water runoff to be controlled and discharged in a way that matches existing greenfield runoff rates as closely as possible. Flow controls will be used to control the runoff and in extreme events the water will back up into the attenuation features where the water will temporarily fill the structures. Once the storm event passes, surface water will continue to discharge at the greenfield rate until the attenuation features are empty. This means that water will not be held in the drainage system indefinitely and will not be prevented from entering The Bogs. This ensures that the flows entering The Bogs will remain the same as in the undeveloped situation.

5.16 Runoff from agricultural fields often contain unwelcome nitrates, pesticides and sediment, therefore redeveloping the site would remove this source of pollution from entering The Bogs.

5.17 The proposed surface water drainage strategy and SuDS will incorporate measures to ensure that the water quality of the runoff from the site will be maintained, if not improved, as a result of the proposed development. This has been done in accordance with Chapter 26 of the CIRIA SuDS Manual (C753) (Ref: CD5.3), which sets the standard for pollution hazard identification and mitigation in drainage design.

5.18 The proposed surface water drainage strategy has been designed with two outfalls into the stream on the western boundary of the site and as stated previously the flows will be controlled to match the existing greenfield runoff rates. Although this results in a concentration of flows at the two outfalls, the peak flows from the site are small in comparison to the peak flows within the main body of the watercourse. For example, for the 1 in 2-year event the peak flow from the site is 11.1l/s (Ref: CD2.13 Appendix C) and the flow in the stream is 220l/s (Ref: CD2.14 Table 3-2). Therefore, the peak site flow is approximately 5% of the existing peak flow in the stream and will not have an impact on the stream and The Bogs. Notwithstanding this, the outfall can be designed to incorporate measures to prevent the erosion of banks within the stream. Examples of these measures are aligning the outfall with the flow of the watercourse, providing a headwall with a stone apron and/or incorporating biodegradable erosion control mats. These measures can be designed and agreed with the LLFA at the Reserved Matters stage.

# 6.0 Foul Water Drainage

6.1 Key issue 10 relates to the capacity of the existing foul sewers.

6.2 The current proposal is to discharge foul water to the existing foul sewer that crosses the site at Southern Water (SW) Manhole 8901 (Wheeler Avenue). The northwest and west of the site will drain by gravity and a foul pumping station will be used to pump foul water from the lower part of the site to the foul sewer.

6.3 SW has a statutory obligation to provide capacity for new developments under the Water Industry Act 1991, which gives developers the right to connect. If network reinforcement is required to serve the new development, this is funded through the Infrastructure Charges (Ref: CD2.9) on new developments.

6.4 A capacity check was submitted to SW on 9/5/2024 and SW responded on 2/12/2024 (Ref: CD1.22.U Appendix E) to confirm that there was capacity for up to 50 units. SW also confirmed that they would aim to provide capacity within 24 months for developments not identified as strategic sites in their current business plan.

6.5 However, as the original capacity check expired after 12 months, a revised capacity check was submitted to Southern Water on 8/10/2025.

6.6 Southern Water responded on 31/10/2025 confirming that there is currently capacity for 0.49l/s, which equates to 54 units (Ref: CD2.15).

6.7 TDC requested clarification as to whether the proposed development is a 'strategic site' for Southern Water purposes and SW has confirmed the following:

*Strategic sites, such as this one, typically involve developments in the hundreds of units, with build-out rates spread over a significant number of years.*

6.8 With the above in mind, Motion has been liaising with SW to understand the capacity issues for the site and how this could be managed post granting of planning permission.

6.9 The site feeds into the Oxted Wastewater Treatment Works (WTW) and SW has budgeted £21.63m and £2m for improvements to the catchment running to the Oxted WTW. Figures 1 and 2 below are taken from the SW Clean Rivers and Seas Plan website and outline the timescales to provide these improvements.

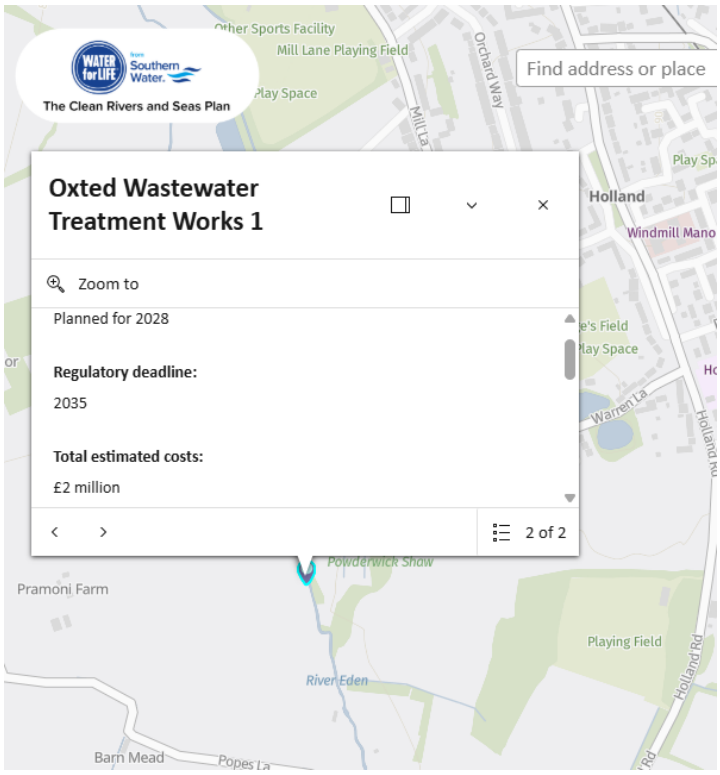


**Figure 1 – Oxted Wastewater Treatment Works 1**

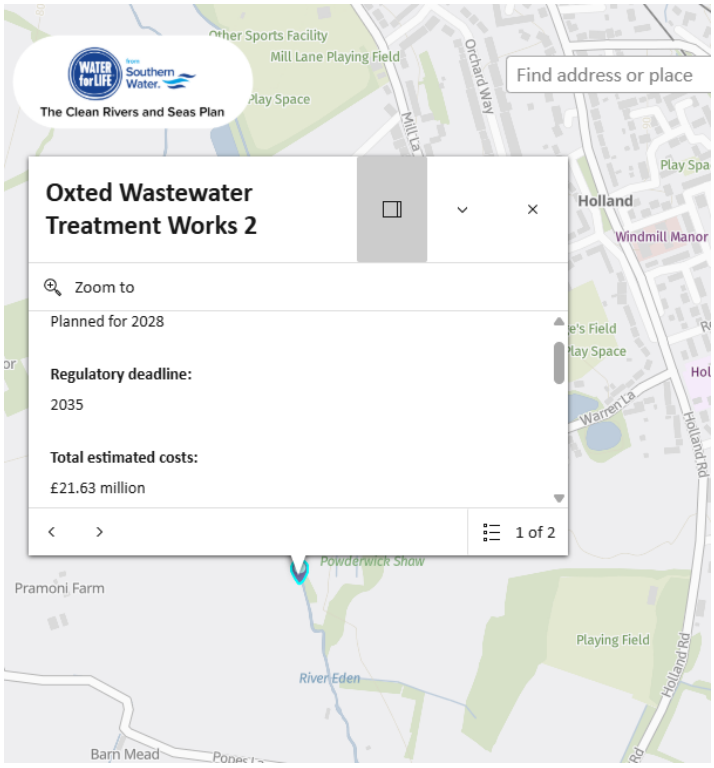


**Figure 2 – Oxted Wastewater Treatment Works 2**

6.10 The above confirms that the improvements works are planned to start in 2028 and have a regulatory deadline of 2035. It is understood that these works include the following:

- Sewer sealing;
- Increased and optimised storage capacity; and
- Working with partners such as the council, local business and community groups.

6.11 As set out in SW's Policy Statement on Network Capacity Modelling (Ref: CD2.16), where network capacity cannot be provided within 24 months of an outline planning permission being granted, alternative supply and discharge arrangements will be required.

6.12 SW's Policy Statement on Alternative Sewerage Discharge Arrangements (Ref: CD2.17) sets out their approach to discharging wastewater when there is insufficient capacity in the foul sewerage network to meet the demand from new development sites. This statement confirms again that SW will commit to delivering capacity within 24 months of an outline planning permission and a confirmed commitment to build. However, where this cannot be achieved alternative supply and discharge arrangements will be required.

6.13 The statement sets out three alternative discharge arrangements, if there is insufficient capacity in the sewerage network:

- Alternative Connections – either permanent or temporary;

  This is where an alternative connection point with capacity is determined as either a permanent or temporary measure;

- Off-Peak Discharging and Real Time Control (RTC)

  This is where wastewater is discharged to the local sewer network outside of peak hours. A more sophisticated system of RTC can also be utilised to optimise the timing and automatic discharge of wastewater to the sewer network;

- Wastewater Tankering

  Where the use of RTC and discharging to an alternative point in the network is not practicable and capacity cannot be provided within the agreed timeframe, collection and disposal of wastewater by tanker can be used.

6.14 Through the ongoing discussions with SW, they have confirmed that they would consider an off-peak pumping solution as a temporary measure, if capacity cannot be provided within 24 months.

6.15 Also, SW has indicated that the proposed diversion of the foul sewer crossing the site provides an opportunity to increase the capacity in the network, by increasing the size of the pipe. This will be delivered via an agreement under Section 185 of the Water Industry Act 1991 and funded by the Developer.

6.16 In summary, SW has a statutory obligation to provide capacity for new developments. SW has confirmed that the existing sewerage network has capacity for 54 units. Also, SW has planned improvement works which will increase capacity in the local sewerage network, which start in 2028, and have a regulatory deadline of 2035. Additionally, SW's policies set out the alternative supply and discharge arrangements if capacity cannot be provided within 24 months of planning permission being granted. Finally, it has also been identified that the Appellant has an opportunity to improve network capacity when the foul sewer is being diverted. In conclusion, the above confirms that foul sewerage capacity is achievable by 2030, through the reasons and mechanisms set out above.

# 7.0 Summary

7.1 The proposed measures within the drainage strategy will ensure that the hydrological regime within The Bogs will remain unaffected by the development. Consequently, objections concerning potential hydrological impacts are without foundation.

7.2 The groundwater will not be impacted by the proposed development. Any measures to protect the development's below-ground structures and services can be dealt with at the detailed design stage, as agreed with the LLFA.

7.3 The proposed SuDS detailed in the surface water drainage strategy will manage and control the runoff from the site, as well as ensuring that the water quality leaving the site will not impact The Bogs.

7.4 The outfalls into the stream will be designed to not adversely impact the bed or banks of the stream.

7.5 SW has a statutory obligation to provide foul water capacity for new developments and they have confirmed that there is existing capacity for 54 units. There are also planned improvements to the sewer network draining to the Oxted WTW. Where capacity is not available SW will work with the developer to provide the necessary capacity for the proposed development and if the capacity cannot be provided within 24 months, alternative discharge arrangements will be agreed between SW and the developer. This confirms that capacity for the proposed development can be provided by 2030.