

BEVERLEY AND NORTH HOLDERNESS INTERNAL DRAINAGE BOARD

(A Member of the York Consortium of Drainage Boards)

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2nd August 2021

East Riding of Yorkshire Council
County Hall
Beverley
East Yorkshire
HU17 9BA

Dear Sir,

Reference: 21/02464/STFUL
Location: Rathlin Energy Ltd, West Newton Exploration Well Site, Fosham Road,
High Fosham, East Riding of Yorkshire
Proposal: To construct an extension to the existing West Newton A (WNA) wellsite,
test, appraise and produce from the two existing wells and drill, test,
appraise and produce from up to six (6) new wells followed by
decommissioning and wellsite restoration
Applicant: Rathlin Energy (UK) Limited

The site of the existing Well Site lies outside of the Drainage Board's area.

There are no Board maintained watercourse directly adjacent to the site.

The Board wishes to state that, where possible, the risk of flooding should be reduced and that, as far as is practicable, surface water arising from a developed site should be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development. This should be considered whether the surface water discharge arrangements from the site are to connect to a public or private sewer before outfalling into a watercourse or to outfall directly into a watercourse.

Any approved development should not adversely affect the surface water drainage of the area and amenity of adjacent properties. No development should be allowed until the Authority is satisfied that surface water drainage has been adequately provided for.

The Board understands that when the well site is in operation the applicant is proposing that surface water run-off is to be collected into an adjacent interceptor ditch and sump and then collected by tanker for offsite disposal.



The Board notes that this is an application for a proposal to construct an extension to the existing West Newton A (WNA) wellsite, test, appraise and produce from the two existing wells and drill, test, appraise and produce from up to six (6) new wells followed by decommissioning and wellsite restoration. It is considered that this will enlarge the existing impermeable area on site and has the potential to increase the rate of surface water run-off from the site if this is not effectively constrained.

The Board has no objection to the principal of this development but suggests that any approval granted to the proposed development should include the following Conditions:

DRAINAGE WORKS TO BE AGREED

No development approved by this permission shall be commenced until the Local Planning Authority in consultation with the Internal Drainage Board has approved a Scheme for the provision of surface water drainage works. Any such Scheme shall be implemented to the reasonable satisfaction of the Local Planning Authority before the development is brought into use.

The following criteria should be considered:

- Any proposal to discharge surface water to a watercourse from the redevelopment of a brownfield site should first establish the extent of any existing discharge to that watercourse.
- Peak run-off from a brownfield site should be attenuated to 70% of any existing discharge rate (existing rate taken as 140lit/sec/ha or the established rate whichever is the lesser for the connected impermeable area).
- Discharge from "greenfield sites" taken as 1.4 lit/sec/ha (1:1yr storm).
- Storage volume should accommodate a 1:30 yr event with no surface flooding and no overland discharge off the site in a 1:100yr event.
- A 30% allowance for climate change should be included in all calculations.
- A range of durations should be used to establish the worst-case scenario.
- The suitability of soakaways, as a means of surface water disposal, should be ascertained in accordance with BRE Digest 365 or other approved methodology.

REASON:

To ensure the development is provided with satisfactory means of drainage and to reduce the risk of flooding.

RESTRICT RATE OF DISCHARGE

No development approved by this permission shall be commenced until a Scheme for the provision, implementation and maintenance of a surface water regulation system has been approved by and implemented to the reasonable satisfaction of the Local Planning Authority in consultation with the Internal Drainage Board. The rate of discharge would not be expected to exceed that of a "greenfield site" taken as 1.4 lit/sec/ha.



REASON:

To prevent the increased risk of flooding.

EVIDENCE OF EXISTING SURFACE WATER DISCHARGE

The applicant shall provide evidence that surface water from the existing site currently discharges to the adjacent watercourse and shall provide details of those points of discharge

REASON:

To prevent the increased risk of flooding.

"EXISTING FIELD DRAINS"

The Applicant states that surface water is to be discharged to the "Existing Field Drains". There is no indication as to where these discharge.

It has been assumed that these discharge to an existing surface water sewer. The appropriate Water Company or its Agents should confirm this fact and also that there is sufficient spare capacity within the system to accept this additional discharge. If this is not the case, then it will be necessary to amend the Application.

If the discharge is to a watercourse, then the Board should be re-consulted. The Applicant should provide information as to the point of discharge of the sewer in order that the Board may comment on the suitability of the receiving watercourse.

DRAINAGE ROUTES

All drainage routes through the Site shall be maintained both during the works on Site and after completion of the works.

Provisions shall be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development.

Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and appropriate measures taken to negate influences.



9 METRE MAINTENANCE STRIP

A strip of land 9 metres wide adjacent to the top of both banks of all watercourses on Site shall be kept clear of all new buildings and structures (including gates, walls, fences and trees) unless agreed otherwise in writing with the Local Planning Authority in consultation with the Board. Ground levels must not be raised within this area. Access arrangements should be agreed with the Internal Drainage Board.

REASON:

To maintain access to the watercourse for maintenance or improvements.

6 METRE CLEAR OF CULVERT

No development, including building, filling, tree planting, or any other permanent obstruction, shall be located over or within 6 metres measured from either outside edge of the pipe forming a culverted watercourse.

REASON:

To ensure that access to the culvert is available for maintenance and prevent damage to the culvert.

4 METRE ACCESS STRIP

A permanent 4 metre wide undeveloped strip shall be made available across the Site. Access arrangements should be agreed with the Internal Drainage Board.

REASON:

To allow access to the watercourse for maintenance purposes.

NO STORAGE OF MATERIALS

There shall be no storage of any materials including soil adjacent to the bank top of the watercourse.

REASON:

To ensure that there will be no risk of the watercourse becoming blocked by debris from the stockpiles or bank slipping due to increased loading of the bank top.



PPS 25 PREMISE

The Board wishes to highlight the premise within PPS 25 that developers, where possible, reduce flood risk overall (paragraph 22) and that, as far as is practicable, surface water arising from a developed site should be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development (paragraph F6). This should be considered whether the surface water discharge arrangements from the site are to connect to a public or private sewer before outfalling into a watercourse or to outfall directly into a watercourse.

The Board's comments have been made following consideration of the information provided by the applicant through the Planning Authority. Should these details change then the Board would wish to be reconsulted.

Yours faithfully,

Jon Church

Jon Church
Engineer

