

Case Officer: Amy Rodwell
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Flood Risk, Planning, and
Consenting Team
Whitebeam Lodge
Merrow Lane
Guildford
Surrey
GU4 7BQ

Recommendation (mark one with X)

Further/amended information required	X
No objection	
No objection – Subject to conditions	
Objection	

Our ref: LLFA-WA-23-0192
Your ref: WA/2023/00294
Date: 09/02/2023

Dear Planning Authority,

Land Centred Coordinates 505938 138328, Knowle Lane, Cranleigh

Thank you for consulting Surrey County Council (SCC) as the Lead Local Flood Authority (LLFA) on the above Outline Planning Application. We have reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems.

As part of our statutory consultee role our advice relates to surface water flood risk and surface water drainage only, the Environment Agency should be contacted for advice in relation to fluvial flood risk.

Consultation request date: 06/02/2023

The following documents submitted as part of the above application have been reviewed and should be referred to as part of any future submissions:

- Flood Risk Assessment and Drainage Strategy, Abley Letchford Partnership, 4th January 2023, documents reference: A423
- Surface Water Drainage Pro-forma dated 30.01.2023
- 1321.02 – Illustrative Masterplan

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.

Insufficient information has been provided, to overcome this, the following changes and information is required:

The application site comprises 11.5Ha of land therefore is classified as 'Major' Development. Any planning application classified as Major Development will need to include a detailed drainage strategy. As per the NPPF, all 'major' planning applications being determined must include full details about surface water drainage and sustainable drainage systems, which is a material consideration.

Paragraph 169 of NPPF states '*Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*



- a) *take account of advice from the lead local flood authority;*
- b) *have appropriate proposed minimum operational standards;*
- c) *have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) *where possible, provide multifunctional benefits'.*

The applicant has not demonstrated that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy.

Our guidance documents require that soakage test results should be completed to accompany both full and outline planning applications. If intrusive investigations cannot be completed to accompany the application the applicant should provide robust justification and evidence as to why. Should soakaways be proposed we require confirmation of ground water levels to demonstrate that a 1m unsaturated zone between the base of the proposed soakaway and highest recorded groundwater level exist. This information will be required at the detailed design stage to determine if any of the attenuation basins require lining to create wetland areas.

A plan is required that clearly indicates the boundary ditches referenced within Section 7.33, please state any standoff from built development to any existing ditches. Evidence should be supplied which confirms the northern ditch has onward downstream connectivity (photographs illustrating the existing ditch would help evidence the existing ditch network).

The greenfield QBar calculation has not been included within the report.

Evidence should be supplied that confirms both the northern and southern outfalls are achievable with a gravity-based solution.

[Planning Advice - Sustainable Drainage Systems \(SuDS\) - Surrey County Council \(surreycc.gov.uk\)](http://surreycc.gov.uk)

A full list of the information we expect to receive as part of Full Planning Application can also be found using the above link.

We are not satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents; however, in the event that planning permission be granted by the Local Planning Authority, suitably worded conditions should be applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. Suggested conditions are below:

- 1) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
 - a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
 - b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of **5.5 l/s/ha applied to the positively drained areas of the site only.**
 - c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).

- d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

- 2)** Prior to the first occupation of the development, a verification report (for the relevant phase) carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is designed to the National Non-Statutory Technical Standards for SuDS.

Informative

If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.

If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

Sub ground structures should be designed so they do not have an adverse effect on groundwater.

If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use our reference number in any future correspondence.

Yours faithfully

Amy Rodwell
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For the Flood Risk, Planning, and Consenting Team