Case Officer: Laura Moyano
E-mail: SUDS@surreycc.gov.uk

Recommendation (mark one with X)

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

Flood Risk, Planning, and
Consenting Team
Whitebeam Lodge
Merrow Lane
Guildford
Surrey
GU4 7BQ

Our ref: **LLFA-EL-23-0121RevA**
Your ref: **2022/3796**
Date: **31/03/2023**

Dear Planning Authority,

16-18 Oatlands Drive, Weybridge, Surrey, KT13 9JL

Thank you for consulting Surrey County Council (SCC) as the Lead Local Flood Authority (LLFA) on the above Full 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.

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

Consultation request date: 24/01/2023

- Flood Risk Assessment - RevA, Lanmore Consulting, November 2022, document reference: 221584/FRA/MK/RS/01;

RevA - Re-consultation request date: 28/03/2023

- Letter, 15 March 2023, LANMOR Consulting;
- Drainage Strategy, November 2020, 221584/DS/MS/RS/01, LAMOR Consulting;

We object to the proposed development. 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 are required:

The application site comprises 0.65Ha with proposals for 33flats and 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 provided sufficient information to address our previous comments.

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. 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.

The applicant has informed that the site currently has a dwelling therefore an intrusive ground investigation cannot be completed. If infiltration is proposed and results are not available, the applicant should use a conservative infiltration rate and demonstrate that there is an alternative drainage solution should future test results show ground conditions are not suitable.

The applicant has used an assumed infiltration rate for the calculations, but the information provided regarding the suitable alternative solution for the site is not sufficient. The drainage strategy states that 'if the testing indicates grounds conditions are not suitable for infiltration, then an alternative method would be to attenuate flows and discharge to the pond at the rear of the site and if there is not permission, then next option would be to discharge to the surface water sewer'. However, the informative letter states that the proposed alternative solution is to discharge to the watercourse at 2.3l/s but no further details have been provided. The applicant must demonstrate that there is an acceptable drainage solution if infiltration is deemed unfeasible. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off, it will not be acceptable to leave the design of the alternative drainage solution for later due to infiltration may not be feasible.

In accordance with **Technical Standard S3**: *'For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.*'
No evidence has been provided which confirms how the Technical Standard has been met.

A surface water discharge rate of 2.3litres/sec is proposed from the application site and is not considered a practicable minimum discharge rate. Many low flow control devices are available on the market to enable very low discharge rates to be achieved. We do not have a minimum acceptable discharge rate, each application is assessed on a site-by-site basis, taking into consideration self-cleansing velocity, space for attenuation, outfall level and blockage risk etc. Supporting evidence must be submitted justify the discharge rate proposed.

In May 2022 the climate change allowances were updated based on a catchment approach. This development is located within the 'Maidenhead and Sunbury Management Catchment' which shows the upper end allowance (recommended by SCC) as 35% for the 3.3% annual exceedance rainfall event and 40% for the 1% annual exceedance rainfall event.

The development offers the opportunity to utilise a range of sustainable surface water management techniques which not only contribute to a reduction in discharge rates from the site, but provide amenity, biodiversity and water quality improvements and contribute to mitigating climate change by considering both drought and flood conditions. Justification should be provided as to why SuDS features such as; green/blue roofs, permeable paving, downpipe planters, attenuating tree pits, raingardens etc have not been utilised.

In accordance with **Technical Standard S9**: *'The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.'* The applicant needs to demonstrate that any flooding from these events will be safely stored on site ensuring no overland flow routes.

Should the Applicant wish to discuss our concerns in more detail we provide a pre-application advice service, details of which are available on our website:
Planning Advice - Sustainable Drainage Systems (SuDS) - Surrey County Council (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:

e) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
f) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events, 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 **equivalent to the pre-development Greenfield run-off.**
g) 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.).
h) 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.
i) Details of drainage management responsibilities and maintenance regimes for the drainage system.
j) 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 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

Laura Moyano
Senior Flood Risk & Network Resilience Officer
For the Flood Risk, Planning, and Consenting Team