

Case Officer: Mike Burch  
E-mail: SUDS@surreycc.gov.uk



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

**Recommendation (mark one with X)**

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

**Our ref:** LLFA-EL-23-1636  
**Your ref:** 2023/2889  
**Date:** 19/12/2023

Dear Planning Authority,

**Land Off Anyards Road and Copse Road Cobham Surrey KT11 2LH**

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.

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: 08/12/2023**

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, Stuart Michael Associates, October 2023, revision 01, document reference: 7073.FRA;

**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 and significant issues have been identified, to overcome this, the following changes and information are required:**

The application site proposes 26 residential dwellings 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:*

- take account of advice from the lead local flood authority;*
- 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'.*

A combined surface water discharge rate of **6 litres/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 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. Predevelopment Greenfield run-off rates have not been established.

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; downpipe planters, attenuating tree pits, raingardens etc have not been utilised.

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 \(surreycc.gov.uk\)](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) 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 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 equivalent to the pre-development Greenfield run-off and including multifunctional sustainable drainage systems.
  - b) 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.).

- c) 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.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) 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.

If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via [SUDES@surreycc.gov.uk](mailto:SUDES@surreycc.gov.uk). Please use our reference number in any future correspondence.

Yours faithfully

Mike Burch  
Critical Drainage Specialist  
For the Flood Risk, Planning, and Consenting Team