

Planning Application Technical Response



Site:	Land at Woodgate Nurseries, Lidsey Road, Woodgate
LPA Reference:	AL/89/24/OUT
Date Assessed:	05 September 2024

OUTLINE APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
Assessment of flood risk	NPPF Paragraph 165, 173 PPG Paragraph 051 SDNSTS S10	☐ Has the Sequential Test been considered?	
		Provide updated information within an amended FRA on; ☐ Fluvial flooding from the ordinary watercourse ☐ Surface water flow path originating offsite ☐ Groundwater flooding ☐ Rainwater surcharged sewer flooding ☐ Historic flood information	
		☐ Address concerns that there is not sufficient room within the development boundary to address flood risk mitigation and also achieved the suggested density of the development.	
Flood Risk Mitigation not appropriate	NPPF Paragraph 165, 173 and 180 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044	☐ Use sequential approach with the following hierarchy. I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed	
		☐ The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.	
		☐ Provide information on safe access and egress to show how the development will be safe for its lifetime. This may include assessment of how proposals will not increase the number of people living and working in areas of flood risk and if there is any	

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		additional burden placed on the emergency services. An emergency plan may also form part of this assessment (see www.adeptnet.org.uk).	
Long term sustainability of the development with regards to flood risk	NPPF Paragraph 173 and 180 PPG Paragraph 004, 036, 061, 068 and 069	☐ Provide site specific ordinary watercourse or surface water flow path modelling.	
		☐ Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	
		☐ Include evidence of appropriate freeboard to finished floor levels from the design flood level.	
		☐ Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	
		☐ Use up to date FEH2022 rainfall data for all design flood events.	
		☐ Provision of an easement of 3 m from the top bank of any watercourse is required for maintenance.	
		☐ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA).	
How does the site currently drain?	NPPF Paragraph 175 PPG Paragraph 059	☐ Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	

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	SDNSTS S1, S2, S3, S4, S5, S6	☐ Greenfield runoff rates and volumes are missing or need to be recalculated (incorrect input parameters).	
		☐ Pre-development brownfield runoff rates are missing or need to be recalculated (incorrect input parameters).	
		☐ Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	
		☐ Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	
Where will the site drain to?	NPPF Paragraph 175 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14	Drainage location hierarchy has not been followed, further information is required on; ☒ evidence why rainwater reuse can't be included.	Informative: Please provide consideration of rainwater reuse.
		☐ Source control and interception has not been provided by the provision of vegetated SuDS.	
		☐ Infiltration proposals – re Groundwater Source Protection Zone I restrictions	
		☒ Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	Objection: Please provide further information on a plan.
		☐ Surface water sewer – no in principle agreement from owner of the asset	

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		☐ Combined sewer – no in principle agreement from owner of the asset	
		☐ In principle objection - proposing to connect surface water runoff to foul sewer	
		☐ Detailed justification required why the application cannot be drained via gravity and a pump is required	
		☐ Full impact assessment of failure and emergency procedures required if a pump is part of the design	
		☐ Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	
Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 175 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063	☐ Overarching proposals of how application must provide water quantity benefits in open, at the surface or above ground SuDS. ☒ Commitment to the use of SuDS and high-level assessment to include: ☐ water quality ☒ biodiversity ☒ amenity	Objection: Please provide further details
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 173, 175 SDNSTS S2, S3, S4, S5, S6	☐ The most precautionary infiltration rate should be used in the design of the attenuation feature. ☐ Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	

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		☐ Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	
		☐ Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	
		☒ The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Objection: Please provide evidence for the 100% AEP runoff rate.
		☒ Proposed discharge rates and volumes are greater than greenfield with no justification	Objection: The proposed discharge rates are based on the impermeable area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.
		☒ Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	Objection: The proposed discharge rates are based on the impermeable area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.
		☐ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	
		☒ Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	Objection: The proposed discharge rates are based on the impermeable area plus an allowance for urban creep, therefore discharge rates are higher than greenfield.

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		☐ A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	
		☐ How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	
		☐ A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	
		☒ Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Objection: Please provide storage volumes for the 3.33% AEP event plus climate change. (45%)
		☒ Outline drainage modelling calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	Objection: Please provide further details.
		☐ Outline drainage modelling calculations should be resubmitted using a CV value of 1.	
		☐ Use up to date FEH2022 rainfall parameters in any modelling scenarios.	
Location of SuDS		☐ Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout.	
		☐ Address concerns that there is not enough room within the masterplan for all SuDS features e.g. sufficient room for swales along main roads and still achieved the required density of the development.	

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How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 175 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	☐ High level assessment of the maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	
		☐ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	
		☐ Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.	
		☒ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).	Objection: Please show on drawings.
		☐ Due to the likely long duration build out time (including phased development proposals), a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices	

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		☐ As it is a phased development, a surface water management and construction phasing plan is required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which is relies on will be constructed prior to any housing or commercial development.	
		☒ A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as the need to discharge to a sewer or watercourse with appropriate pollution measures.	Objection: Please provide information.

From: Rhiannon Lloyd on behalf of Planning.Responses
Sent: 05 September 2024 16:07
To: Planning Scanning
Subject: FW: LLFA Response To Planning Application Number AL/89/24/OUT at Land at Woodgate Nurseries, Lidsey Road Email 2 of 2
Attachments: AL 89 24 OUT checklist 050924.pdf

Surface water drainage response

Thanks,

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From: [REDACTED]
Sent: Thursday, September 5, 2024 1:25 PM
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: LLFA Response To Planning Application Number AL/89/24/OUT at Land at Woodgate Nurseries, Lidsey Road Email 2 of 2

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LLFA Response To Planning Application Number AL/89/24/OUT at Land at Woodgate Nurseries, Lidsey Road Email 2 of 2

Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to

[REDACTED] the responding officer can be contacted directly via email if there are any questions relating to this response.

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