

Case Officer: Laura Moyano
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Recommendation (mark one with X)

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

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

Our ref: LLFA-SP-22-1142
Your ref: 22/01615/OUT
Date: 19/12/2022

Dear Planning Authority,

Bugle Nurseries, Upper Halliford Road, Shepperton, TW17 8NS

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.

Consultation request date: 05/12/2022

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 & Drainage Strategy, November 2022, Mayer Brown, APBUGLE.23-FRA, 4th Issue;**

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 1.98 Ha 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*’.

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.

The preliminary hydraulic calculations show that there will be 4.8m³ flood within the 100 years +40% climate change event. FRA and SuDS strategy states that ‘in the event the capacity of the proposed surface water drainage network is exceeded, the excess water will flow into the soft landscaping to the west of the site at an unrestricted rate, leaving properties unaffected. No detailed information has been provided about this flooding event.

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.’* A plan is required to show exceedance flows (i.e. during rainfall greater than design events or during blockage) and an explanation of how property on and off site will be protected from increased flood risk. This should be a standalone drawing. The drawing should include the following information as a minimum:

- Finalised Finished Floor Levels.
- External levels, including but not limited to external plot levels, garden levels, road levels, parking areas, and boundary levels.
- Surface water drainage system including private plot drainage.
- Directional arrows indicating where surface water would flow during exceedance events i.e. rainfall events over and above the design criteria (usually 1 in 100 year + 40% event) this should include the flow route off site.
- Areas where surface flooding would occur, including water depths where applicable
- Any existing retained surface water drainage infrastructure
- Existing watercourse on or immediately adjacent to the site

No maintenance considerations have been identified. The applicant should confirm how the surface water drainage system will be maintained for the lifetime of the development.

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. SuDS features such as; green/blue roofs, downpipe planters, attenuating tree pits, raingardens etc should be included in the drainage strategy.

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 Outline 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 and further information is required. 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 (+40% allowance for climate change) storm events and 10% allowance for urban creep during all stages of the development.
 - 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.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
 - 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 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 SUDES@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