



From: Laura Moyano <Laura.Moyano@surreycc.gov.uk>
Sent: 27 April 2023 15:30
To: Sean Scott
Cc: Statutory
Subject: LLFA-TA-23-0543 Land At The Old Cottage, Station Road, Lingfield, RH7 6PG
Attachments: LLFA-TA-23-0543 Land at the Old Cottage.pdf

Our ref: LLFA-TA-23-0543
Your ref: 2022/685
FAO Sean Scott

Dear Sean,

Please see attached our response to the planning application above. Should you have any queries please do not hesitate to contact me.

Kind Regards,
Laura Moyano
Senior Flood and Climate Resilience Officer
Flood Risk, Planning and Consenting Team
Surrey County Council – Merrow Depot
Email: laura.moyano@surreycc.gov.uk



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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-TA-23-0543
Your ref: 2022/685
Date: 27/04/2023

Dear Planning Authority,

Land At The Old Cottage, Station Road, Lingfield, RH7 6PG

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: 17/04/2023

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

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

The application site comprises 6.20Ha 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'.*

Greenfield runoff fates have been calculated, but the full calculations have not been provided therefore it is unclear if the proposed discharge rate is acceptable. The surface water discharge rate of 15litres/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 S2:** *'For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rate for the same event.'*

This scheme will need to demonstrate that the surface water discharge from the increased impermeable area is discharged at the existing greenfield runoff rate, and that no over land flooding occurs in the 1 in 30 year event and 1 in 100 year event and any flooding in the 1 in 100 plus climate change does not leave the site via overland flow routes and it is demonstrated that it will be safe including for the critical rainfall duration.

The preliminary hydraulic calculations appear to use the incorrect climate change allowance. In May 2022 the climate change allowances were updated based on a catchment approach. This development is located within the 'Medway Management Catchment' which shows the upper end allowance (recommended by SCC) as 35% for the 3.3% annual exceedance rainfall event and 45% for the 1% annual exceedance rainfall event.

It is proposed to discharge the surface water to the existing ditch, but no detailed information has been provided regarding the watercourse, outfall, and bank levels. However, the surface water drainage design currently includes pumping to the adjacent watercourse therefore this proposal would not meet standard S12 of the technical standards.

In accordance with Technical Standard S12: *'Pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.'* A pumped system is the last discharge method to be considered due to the high likelihood of failure during a storm and is also the least sustainable method. Any pumped system should be justified through substantial evidence and a maintenance and management plan needs to be submitted specifically for the pumped system if this does not occur the risk of flooding to the site and surrounding area will increase. If the surface water can be drained without the use of a pump, then this approach should be used.

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.'* No evidence has been provided to demonstrate that exceedance events have been considered.

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

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; 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 **equivalent to the pre-development Greenfield run-off**.
 - 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 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 and Climate Resilience Officer
For the Flood Risk, Planning, and Consenting Team