

Further to our recent meeting, we also discussed the outstanding matters as they relate to the drainage strategy for the site and the ongoing comments in relation to landscaped boundary buffers, as commented on in the consultation responses received from the County Council (LLFA and Ecologist) on 24<sup>th</sup> and 30<sup>th</sup> July respectively. I will address both matters in turn.

### **Drainage Strategy (comments from the LLFA – 24<sup>th</sup> July 2019)**

The further consultation response received from the LLFA (HCC) commented that they had serious concerns regarding the number and size of orifice plates being used for the site and states that it needs to be understood why a smaller number of larger orifice plates could not be used. It was further commented that the maintenance plan does not indicate the organisation responsible for maintenance and that report should also include maintenance of the entire system. The LLFA states that they require this further information before they can make a decision on whether to recommend if planning permission can be granted.

As we discussed at our recent meeting, the drainage information submitted to date, sets out the strategy to be followed in the implementation of an appropriate drainage design. The final detailed drainage system has not been designed at this stage and subject to the principles of the strategy meeting appropriate design criteria, the detailed design is generally dealt with by way of an appropriately worded planning condition.

In response to the first point, it has been confirmed by our specialist drainage consultants, who have prepared the drainage strategy, that there are no concerns with the size or number of orifice plates indicated on the layouts. They have further advised that the Ciria document C753 “The SuDS Manual” is generally accepted as industry best practice for SuDS design. In chapter 20 “Pervious Pavements” it states that; ***“Orifice plates in a control chamber can be very small (min.20mm) because the risk of blockage is low, because the water is filtered”***.

#### **c) Outflow from the pavement structure**

For the sub-base storage to operate effectively, the system requires flow controls (unless the discharge mechanism is via infiltration). These are generally small orifice plates in a control chamber can be very small (minimum 20 mm) because the risk of blockage is low, because the water is filtered. Where the sub-base is divided into discrete areas (separated by impermeable construction) careful consideration is required of flow control locations and characteristics to ensure that the storage is optimised and that there is no risk of inappropriate constriction and potential flooding. outflow can also be to a rainwater harvesting system via a sump and pump chamber.

This provides comfort in terms of the strategy proposed for the site and can leave the final detail of its delivery to be secured by an appropriately worded planning condition.

Insofar as the maintenance organisation is concerned. It is not yet known who this will be and this matter in itself is not fundamental to the approval of the principles of the drainage strategy at this stage. It can again be confirmed at the detailed design stage and can be covered by an appropriately worded planning condition.

On this basis, there are no reasonable grounds upon which to withhold a grant of planning permission on drainage related matters.

### **Woodland Scrub Loss**

As discussed at our meeting the application site does not have a fundamental role in the linkage of ***“various areas of ancient woodland in the wider landscape”*** and nor will its development have a detrimental effect on the wider ecological network and to suggest so is quite disingenuous. We have already carried out the ecological assessment that shows there will be no adverse impact. The proposal is effectively filling in a brownfield site that is no longer connected to either the wider ecological network or wider ancient woodland landscape due to the extent of development that has already occurred in the area and on the immediate boundaries of the site. The application site is contained on all sides by neighbouring development or infrastructure.

In any event, the woodland scrub corridor associated with the site, falls outside of its site boundary on the neighbouring ASDA land and will not be affected by the development proposal or have the effect of changing any relationship with the wider landscape network. This corridor also includes TPO protected trees.

As discussed, the application site is a small and constrained site and I’m afraid that the County Ecologist is wrong to assume that ***“it would be possible to achieve the desired quantum of accommodation without having to impact on semi-natural habitats which link various areas of ancient woodland in the wider landscape”*** . The proposed layout is the best and most practical layout for the proposed development. It is neither practical or viable to consider a reconsideration of the site layout and for the reasons set out in my opening paragraph there are no fundamental overriding reasons that would support this. Insofar, as the boundaries are concerned, the primary objective are the retaining wall works, which will have to be carried out to improve the stability conditions. There will however, be the opportunity to consider enhancement opportunities of the existing the scrub boundary following completion of the retaining wall works. This is again something that would be provided for as part of an appropriately worded landscape condition.

The above provides an appropriate response to the outstanding consultee comments, which do not in themselves present a fundamental barrier to the granting of planning permission and which can also be dealt with by appropriately worded conditions.

Please let me know when you have had chance to consider our further submission.

Kind Regards  
Amanda

Amanda Olley MRTPI  
Director

---

Summit Planning Associates Ltd