

I've looked over the submission, and it doesn't address all the points / requirements directly. It is however clear that a suitable design approach was applied, and due consideration has been given to the attenuation of pollution. The C753 document is very recent, and the assessment undertaken in Appendix C utilised the guidance in place at the time (C697 - Suds Manual), and could therefore be regarded as being 'in accordance with the principles of' C753 (Revised Suds Manual).

It would seem unreasonable to require a re-assessment (which might involve a re-design) given that the original design brief was based upon numbers that were correct at the time – I will leave it to the EA to raise any outstanding queries with respect to the difference in treatment between C697 & C753 with respect to infiltration elements (unlined swales, infiltration basin), it may be that this is not a material concern.

The information provided does not include groundwater level monitoring. Notwithstanding monitoring referred to in respect of the assessment of ground contamination, groundwater *level* monitoring data would influence system storage capacity (swales & basin), and is likely to be of greater interest to the LLFA. I note have accepted the calculations provided, so it may be a reasonable assumption that the LLFA is satisfied that seasonal high groundwater levels are unlikely to adversely impact storage capacity in a materially significant way – it is possible that the LLFA may have received details via an informal route.

No details are provided with respect to the interceptor type / capacity / model of interceptor, nor is the party responsible for it's maintenance identified, or a schedule of preventive maintenance provided. These are the matters of principal concern to EH.

Condition 9 requires confirmation of the specification & capacity of the interceptor, a maintenance schedule & a clearly identified person / party responsible for implementing that schedule. In this way, the submitted information remains insufficient to recommend discharge of c.9 as it relates to the entire site.

In respect of residential area SUDS, the ACD landscape management plan fulfils these requirements (i.e. identifies responsible parties & outlines a maintenance schedule) in respect of the residential area.

The consented development is mixed use, and includes both the residential & commercial elements. Looking at the documentation it is apparent that the residential area could be regarded as Phase 1, and the commercial as Phase 2. It is possible that (the pre-commencement) condition (9) requires details that have not yet been finalised for the phase 2 / commercial area of the development. If it is possible to treat the site as separate phases, it would be appropriate to discharge c.9 for the residential area, however the details would still need to be agreed prior to the commencement of phase 2 (in the absence of phase 2, there is no pollution to attenuate – site would remain undeveloped / greenfield).

If it is not possible in planning terms to treat the site as a phased development (or this is not representative of the construction schedule) and the site must necessarily

be treated as a single area; the submitted information cannot be regarded as sufficient and I still require –

- Confirmation of interceptor type, capacity, and specification.
- Identified party responsible for routine maintenance of the interceptor unit (periodic inspection & cleaning)
- Maintenance schedule outlining maintenance tasks and required frequency, and ideally mechanisms for proactive ad-hoc maintenance in response to incidents (i.e. prior to reports of pollution in swales / pond)

Best Regards,

Jon

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