

LLFA comments raised	CGV Response
Page 2 <i>“The above flood risk assessment includes updated flood risk mapping following publication of the EA NaFRA2 data earlier this year. Although the areas of identified surface water flood risk has changed, and the assessment within the FRA has been updated, the conclusion of the report remains unchanged. We note the 1 in 100 year medium risk surface water flood map has been considered. Review of the EA surface water flood maps indicates large areas of the site that are subject to low risk of surface water flooding. This flood risk does not appear to have been satisfactorily taken into account and should be considered when determining the site layout. Surface water attenuation features should be located outside of identified areas of flood risk. In the event of a surface water flood the proposed attenuation basin would be inundated and the proposed drainage system would not operate as designed. We raised this concern in our last response and this concern remains outstanding.”</i>	The comment raised regarding locating surface water attenuation features outside areas indicated at risk of surface water flooding is in our opinion not applicable for this site. The potential risk for surface water ponding/ flooding occurs within the ditches and a small area where the attenuation pond will be constructed. The potential for surface water flooding is created from runoff from within the site (the fields) to be developed. It is not a surface water channel/ path from another site, so the location of the pond is appropriate. If the site is developed any runoff surface water would be captured and mitigated by the new surface water drainage system and no surface water flood risk will remain. The existing ditches would be part of a regular maintenance regime and the would be at less risk of flooding.
Page 2 <i>“Following review of the existing greenfield runoff calculation and the proposed post development causeway flow hydraulic calculations the LLFA concludes that the proposed discharge rate for the site is not acceptable. The greenfield runoff calculation uses the site area of 2.48ha where the hydraulic calculations uses an estimated total impermeable area of 1.189ha. As the areas used in the calculations differs, the pre and post development discharge rates are not comparable and therefore the applicant has not demonstrated that the discharge rate from the site would not be increased as a result of the development.”</i>	It is industry wide accepted that you use the greenfield (pre-development) runoff rate for the whole area that currently contributes runoff to the receiving system (i.e. the whole site or contributing catchment), not just the impermeable/developable portion — then control post-development runoff from the developable/impermeable area so that the discharge from the site does not exceed that greenfield rate. “Greenfield runoff” describes the pre-development (undeveloped/vegetated) behaviour of the whole site or contributing catchment, so the benchmark/target discharge is normally based on that full pre-development area. Designers must therefore show that post-development flows (from the new impermeable areas) are attenuated so the site does not increase peak flow to the receiving watercourse. Which has been done here. This is standard practice. It should also be noted that we have allowed for a CV value of 1 which is allows for 100%

	run off and gives a conservative result. See section 4.1.3 and 4.1.4.
Page 2 <i>"The LLFA would like to make clear that the drainage design is not in accordance with best practice or the National Standard for SuDS referenced in paragraph 7.2.7 of the above drainage strategy report in that only runoff from impermeable areas has been considered in the hydraulic calculations. We encourage a catchment based approach to drainage design in which all areas that are likely to contribute to the flow in the drainage network are considered. Runoff from permeable areas including gardens, shared green spaces and SuDS features should not be ignored"</i>	The runoff from the gardens is very unlikely to now find its way to the watercourse as there will be properties, roads, driveways and parking areas in the way, although we have allowed for a CV value of 1.0 in our calculations. In addition, as the final outfall is into a Southern Water sewer so they will not allow groundwater into their drainage network. The site is relatively flat and there will be some infiltration into the ground. The impact on rainfall falling direct onto the pond has been checked and the design has been modified slightly. The pond has increased in size. As the LLFA officers will know when the detailed design is carried out improvements to the layout and model will take place but it is clear that a sustainable design with no flood risk can be achieved as shown. The LLFA have accepted this in their response.
Page 2 <i>"There are discrepancies between the drainage layout and the hydraulic calculations. We consider the hydraulic calculations are not representative of the current design."</i>	These have checked and verified on the latest iteration of the plan and calculations. See calculations in Appendix H and Drainage Layout in Appendix G.
Page 3 <i>"An allowance for climate change has not been applied to the 1 in 30 year event in the simulation settings within the hydraulic calculations."</i>	This has been included in the latest calculations, see Appendix H.
Page 3 <i>"We note the allowance for urban creep has been reduced from 10% (as previously proposed) to 5%. Justification is required for this change in value"</i>	Realistically 10% urban creep is never going to be achieved as the site is fully developed, and the density is relatively high (41%). There is little or no scope to provide additional parking in any of the units as the scheme as shown provide only little front gardens. 18 of the units will be social housing and 8 will be apartments so these units will not expand. The average property drawn for this scheme is shown as 60m², if you remove the apartments and say all 52 units could have extensions in the future and an average of 12m² per property then this equates to 5.2% of the 1.189ha contributing to the drainage network.

Page 3 <i>"The simulation results indicate flooding resulting from the 1 in 100 year design event. It is not clear whether this flood volume can be managed within the site without risk of flood to property or whether the attenuation basin has been adequately sized. We raised this concern in our last response and this concern remains outstanding. Please refer to our letter dated 31 March 2022 for further detail."</i>	An older version of the model was issued, the latest model shows no flooding even in the 1 in 100 year plus climate change event. All water will be managed within the system.
Proposed points raised in the S106 panning conditions	
Page 3-point 1a. <i>"A technical summary of the surface water drainage design."</i>	Agreed this would help and has been included in an expanded section 7 of the report.
Page 3-point 1b. <i>"Detailed drainage layout plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations. Catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths and gradients should be included."</i>	The level of information for an outline planning application supported by a comprehensive drainage strategy report has been included in the report. These comments appear to be a generic response if no formal comprehensive report was issued. Except for a catchment plan all details have been included within the report and plans.
Page 3-point 1c. <i>"Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change. Detailed hydraulic calculations 4 for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage network including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference as the submitted drainage layout."</i>	These have been provided in the report, and the cross references have been checked for version 3 of the report.
Page 4-point d. <i>"Evidence that 10 % urban creep allowance has been included within the calculations."</i>	10% urban creep is not relevant for such a high density layout as detailed above.
Page 4-point e. <i>"Confirmation on how impacts of high groundwater will be managed in the design of the proposed drainage system to ensure</i>	The pond and any attenuation tanks will be lined to ensure no impact from groundwater. See section 7.1.5 of the report. For biodiversity benefits the pond will be lined

<i>that storage capacity is not lost, and structural integrity is maintained.”</i>	and currently we have shown the base of the pond 150mm below the incoming and outgoing pipes.
Page 4-point f. <i>“Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.”</i>	This is clearly covered in the report.
Page 4-point g. <i>“Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.”</i>	These were shown on the original layout and extra flow paths have been indicated.
Page 4 Condition 2. <i>“The condition of the existing watercourse/balancing pond/sewer, which will take surface water from the development site, should be investigated before any connection is made. If necessary, improvement to its condition as reparation, remediation, restitution and replacement should be undertaken. Evidence of this, including photographs should be submitted. If necessary, evidence that the asset owner has agreed to the discharge rate and connection should be submitted before any connection is made.”</i>	We note that that Southern Water have recently been consulted (22 nd September 2025) and they will be responded in 21 days about the application (13 th October). They cannot object on capacity terms but can recommend that reinforcement is carried out. If the condition of the sewers are poor, it is the Water Authorities responsibility to make good their sewers. As a due diligence exercise a developer would carry out this exercise.
Page 4 Condition 3 <i>“Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include;”</i>	This is a condition that should be included along with a condition that ensures that a drainage verification report is carried out.
Page 6 <i>“It is strongly recommended that this information is reviewed before Land Drainage consent application is made.”</i>	Pre-planning advice has been requested under separate cover but will not be included in this report. An OWC consent should not have any impact on planning. On the assumption the design and an application is submitted correctly the LLFA cannot object to the application. The site already drains to the same watercourse.