

SITE : Land to the South of A438, parcel no. 0008 and part parcel no 2308, Bartestree, Herefordshire

TYPE: Outline Permission

DESCRIPTION: Outline proposal for the erection of 60 dwellings (including 21 affordable houses) and a change of land use to form community open space

APPLICATION NO: P140926/O

GRID REFERENCE: OS 356089, 241126

APPLICANT: Mr P Ingram

This response is in regard to flood risk and land drainage aspects, with information obtained from the following sources:

- Environment Agency (EA) indicative flood maps;
- EA groundwater maps;
- Ordnance Survey mapping;
- Strategic Flood Risk Assessment for Herefordshire;
- Herefordshire Unitary Development Plan - March 2007.

Our knowledge of the development proposals has been obtained from the following sources:

- Application for Outline Planning Permission;
- Site location plan;
- Proposed site layout;
- Flood Risk Assessment, February 2014.

Site Location

Figure 1: Environment Agency Flood Map for Planning (Rivers and Sea), April 2014



Overview of the Proposal

The Applicant proposes the construction of 60 new dwellings (with associated access and car parking) on two parcels of land separated by a tree-lined driveway leading to Hagley Court. Both parcels of land are currently under agricultural use and, combined, give a total development area of 4.3 hectares (ha). Parts of both parcels will remain undeveloped or given over as community green space.

Fluvial Flood Risk

Figure 1 indicates that the site is located in the low risk Flood Zone 1, where the annual probability of flooding from fluvial sources is less than 0.1% (1 in 1000). As the site is greater than 1 ha, a Flood Risk Assessment (FRA) is required in accordance with National Planning Policy Framework (NPPF) as part of the planning application. A FRA has been provided by the Applicant, which confirms the low fluvial flood risk at the site.

Other Considerations and Sources of Flood Risk

As required by NPPF, the FRA also gives consideration to flood risk from other sources. The potential flood risk from surface water, groundwater, impounded bodies of water and sewers have been assessed and considered to be of low risk. We concur with this assessment. Flood risk from the adjacent A438 public highway has also been considered and whilst the risk of flooding from this source is also considered to be low, it has been highlighted in the FRA that measures may be required at the site entrances to prevent excess water running off the road into the proposed development.

The FRA also includes an assessment of the likely impacts of future climate change on the proposed development.

Surface Water Drainage

No drawings have been submitted with the application showing a proposed drainage strategy for the development.

The FRA assesses potential surface water drainage options at the site and concludes that infiltration is unlikely to be feasible at the site due to the local geology, but soil infiltration tests will be carried out at the site at a later date to confirm this. The FRA also includes a comparison of pre and post-development runoff and concludes that surface water attenuation will be required to limit surface water discharge to pre-development greenfield runoff rates. If the soil infiltration tests confirm infiltration is not feasible, a disposal option to either a watercourse or public sewer will be required. The FRA does not indicate which disposal route would be used, or whether maximum allowable discharge rates have been agreed with the relevant authorities.

In accordance with the draft National Standards for Sustainable Drainage and Policy DR4 of the Unitary Development Plan, the drainage strategy should incorporate the use of Sustainable Drainage (SUDS) where possible. SUDS features offer multiple benefits including reduced flow rate, maximising infiltration, water treatment, biodiversity and amenity benefit. The approach promotes the use infiltration features in the first instance. If drainage cannot be achieved solely through infiltration due to site conditions or contamination risks, the preferred options are (in order of preference): (i) a controlled discharge to a local watercourse, or (ii) a controlled discharge into the public sewer network (depending on availability and capacity).

The Applicant must demonstrate that the development will not have an adverse impact to people and property elsewhere up to and including the 1 in 100 year event over the life time of the development. Therefore, the Applicant must provide sufficient on-site storage of surface water runoff for the 1 in 100 year event with a 30% increase in rainfall intensity to allow for the effects of climate change over the design life of the development. A design life of 100 years is considered appropriate for residential development.

Under Schedule 3 of the Flood Water Management Act 2010 (due to be enacted in late 2014) all new drainage systems for new and redeveloped sites must meet the new National Standards for Sustainable Drainage (currently in draft) and will require approval from the Lead Local Flood Authority (Herefordshire Council). If approval is gained, the site drainage may be eligible for adoption by Herefordshire Council. Further guidance will be available from Herefordshire Council in late 2014.

The Applicant makes no reference to the treatment of surface water prior to discharge. Evidence of adequate separation and/or treatment of polluted water should be provided to ensure no risk of pollution is introduced to groundwater or watercourses, both locally and downstream of the site.

Foul Water Drainage

We recommend that the Applicant contacts Dwr Cymru Welsh Water in regards to foul water discharge from the site to check whether it is feasible to connect to the public sewers.

Overall Comment

Overall, for outline planning permission, we do not object to the proposed development on flood risk and drainage grounds. However, all new drainage systems for new developments must meet the new National Standards for Sustainable Drainage (currently in draft) and will require approval from the Lead Local Flood Authority (Herefordshire Council). Therefore, should the Council be minded to grant outline planning permission, we recommend that the submission and approval of detailed proposals for the disposal of foul water and surface water runoff from the development is included within any reserved matters associated with the permission. The detailed drainage proposals should include:

- Provision of a detailed drainage strategy that demonstrates that opportunities for the use of SUDS features have been maximised, where possible, including use of infiltration techniques and on-ground conveyance and storage features;
- Evidence that the Applicant has sought and agreed permissions to discharge foul water and surface water runoff from the site with the relevant authorities;
- Evidence that the Applicant has sought and agreed allowable discharge rates for the disposal of foul water and surface water runoff from the site with the relevant authorities;
- Evidence that the Applicant is providing sufficient on-site attenuation storage to ensure that site-generated surface water runoff is controlled and limited to agreed discharge rates for all storm events up to and including the 1 in 100 year rainfall event, with a 30% increase in rainfall intensity to allow for the effects of future climate change;
- Demonstration that appropriate pollution control measures are in place prior to discharge.