From: David Stones [redacted]
Sent: 10 April 2025 00:09
To: Planning Enquiries <planningenquiries@herefordshire.gov.uk>; Bailey, Josh <Joshua.Bailey@herefordshire.gov.uk>
Subject: Ref: P240468/F Greyhound Close Objection to Drainage Strategy

Dear Sir/Madam

Please find attached my technical objection to the proposed surface water strategy at the proposed Greyhound Close development in Longtown.

Kind regards

David Sones

Glandwr, HR2 0NH

To: Josh Bailey, Planning Case Officer, Herefordshire

Email: planning_enquiries@herefordshire.gov.uk, Josh.Bailey@herefordshire.gov.uk

[redacted]

Subject: Objection – Surface Water Drainage Strategy for Land South East of Greyhound Close, Longtown
Planning Ref: P240468/F
Date: 9th April 2025

Subject: Technical Objection to Surface Water Strategy - Inadequate Attenuation Storage and Non-Compliance with Surface Water Management Standards

I write to formally object to the planning application for residential development at Land South East of Greyhound Close, Longtown, on the basis that the proposed surface water drainage strategy is fundamentally flawed and fails to comply with relevant national and local drainage standards. The application is in breach of Core Strategy Policy SD3 and NPPF Para 167, which require development not to increase flood risk elsewhere or rely on measures that are not demonstrably viable or sustainable.

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1. Inappropriate Use of Impermeable-Only Area in Attenuation Sizing

The applicant has calculated required attenuation volumes based only on impermeable areas (1,983.5 m²)— excluding the remainder of the site's area (total ~5,719 m²), which will still contribute runoff via overland flow, particularly during extreme events or periods of saturation.

This approach is contrary to the Environment Agency's Rainfall Runoff Management for Developments guidance, which clearly states:

"For greenfield sites, runoff should be calculated using the total site area, not just the impermeable area, unless a demonstrable, permanent, and reliable mechanism exists to prevent runoff from undeveloped areas entering the drainage system."

No such mechanism (e.g., bunds, swales, or cut-off drains) is described in the drainage report. Thus, the true contributing area has been underestimated, and the required attenuation is likely significantly higher than the reported 116 m³.

As a result:

- The pond is under-sized, potentially by a factor of up to 3x, once total runoff and appropriate safety margins are included.
- This would require a pond 3 times larger, with a surface area of ~800–1,000 m², which cannot be accommodated on the current site layout without removing 2–3 dwellings.

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2. Conflict with Herefordshire SuDS Handbook and Local Policy SD3

Herefordshire's SuDS Handbook (June 2018) states that runoff should be attenuated to greenfield rates for all events up to 1 in 100 years + 40% climate change.

The current proposal:

- Is based on a constrained and optimistic assumption set, including generous Cv values, minimal safety buffers, and no exceedance flow route modelling.
- Lacks detailed design evidence of the pond geometry, outfall control features, or sedimentation capacity.
- Has no confirmed long-term management plan despite relying on above-ground SuDS for critical attenuation.

This places the strategy in breach of Core Strategy Policy SD3 and NPPF Para 167, which require development not to increase flood risk elsewhere or rely on measures that are not demonstrably viable or sustainable.

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3. Geotechnical Risks and Drainage Reliability

The drainage report admits that infiltration is unviable due to high groundwater levels and clay-rich soils. The proposed pond is sited in an area of poor drainage and moderate slope, which further raises questions about:

- Base stability and erosion risk,
- Overflow safety in the event of blockage or storm exceedance,
- Long-term effectiveness in stormwater attenuation and water quality treatment.

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4. Recommendation

It is recommended that the Local Planning Authority:

- Refuse the application unless a revised drainage strategy is submitted that:
  - Bases attenuation on total site area, not just impermeable surfaces;
  - Provides full MicroDrainage or equivalent calculations, including exceedance analysis;
  - Demonstrates full compliance with EA and Herefordshire SuDS guidance;
  - Revises the site layout to allocate sufficient space for an appropriately sized attenuation pond and long-term maintenance access.

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5. Conclusion

This objection is submitted to ensure that surface water drainage is managed correctly at this site and that the development is both environmentally sustainable and legally compliant.

Failure to properly size and design the attenuation pond will likely result in increased flood risk both on- and off-site, and sets a poor precedent for drainage design in the region.

Yours sincerely,

David Stones Beng Civil

Glandwr, HR2 0NH.