SITE:	Land at Meredith Farm, Llancloudy, Herefordshire HR2 8QR
TYPE:	Planning Permission
DESCRIPTION:	Proposed variation of condition 2 of permission 193027 (Proposed construction of 4 no. dwellings with access) - To improve the elevations and incorporation of construction considerations.
APPLICATION NO:	211873
GRID REFERENCE:	OS 349663 - 221214
APPLICANT:	Chevvy Pennycook
AGENT:	Miss Kate Da-Costa-Greaves

Our knowledge of the development proposals has been obtained from the following additional sources since our previous consultations in November 2021:

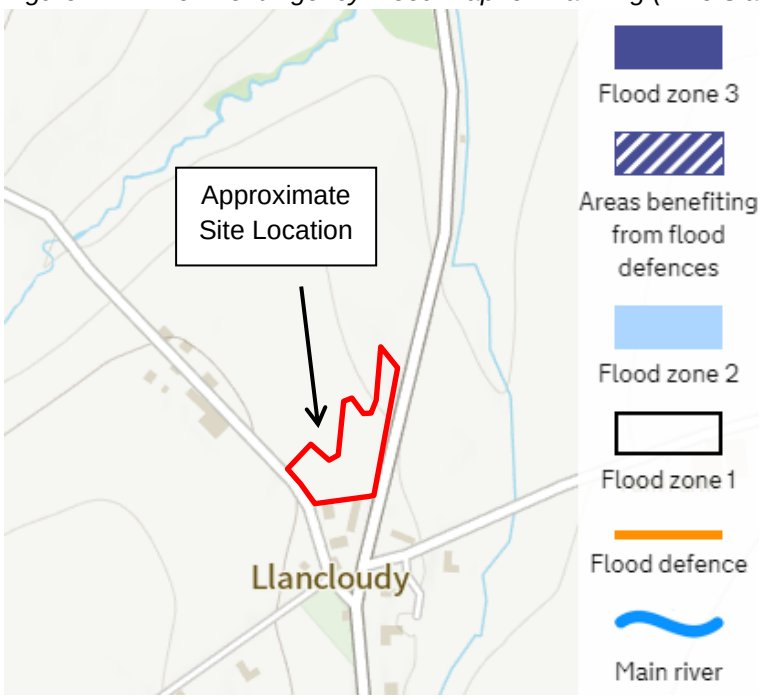
- Drainage Layout 26.11.21 (Ref: 1476-003 Rev E);
- Supplementary Soakaway Testing Report dated 21.6.21-16.11.21;
- Soakaway & Vp Test Report dated 20.11.20-16.11.21.

Overview of the Proposal

The Applicant proposes the variation of condition 2 of permission 193027 (Proposed construction of 4 no. dwellings with access) - To improve the elevations and incorporation of construction considerations. The site covers an area of approx. 0.49ha and is currently agricultural land. The topography of the site slopes down from the southwest to the northeast by approx. 9m.

Site Location

Figure 1: Environment Agency Flood Map for Planning (Rivers and Sea), November 2021



Flood Risk

Fluvial Flood Risk

Review of the Environment Agency's Flood Map for Planning (Figure 1) indicates that the site is located within the low risk Flood Zone 1. As the proposed development is less than 1ha and is located within Flood Zone 1, in accordance with Environment Agency standing advice, the planning application does not need to be supported by a Flood Risk Assessment (FRA). This is summarised in Table 1:

Table 1: Scenarios requiring a FRA

	Within Flood Zone 3	Within Flood Zone 2	Within Flood Zone 1
Site area less than 1ha	FRA required	FRA required	FRA not required*
Site area greater than 1ha	FRA required	FRA required	FRA required

**except for changes of use to a more vulnerable class, or where they could be affected by other sources of flooding*

Surface Water Flood Risk

Review of the EA's Risk of Flooding from Surface Water map indicates that the site is not at risk of surface water flooding.

Other Considerations and Sources of Flood Risk

There may be a risk of surface water flooding from higher land. The Applicant would need to consider the likely flow routes in the vicinity of the proposed development site. It may be necessary to raise the threshold levels slightly to prevent ingress.

Review of the EA's Groundwater map indicates that the site is not located within a designated Source Protection Zone or Principal Aquifer.

We note the proposals to install 2x150mm pipes under the proposed access road junction to allow for the continued flow of the drainage ditch. The applicant should resubmit the drainage design plans to show that the headwall is located sufficiently downstream to be parallel with the kerbs and we would prefer one 225mm dia pipe is installed.

Surface Water Drainage

We note that supplementary soakaway testing was undertaken at the site in May 2021. The pits were located close to the proposed soakaway areas and excavated to a maximum depth of 2.4mbgl. 3 tests were performed in each of the two pits and the slowest infiltration rates of 6.51×10^{-6}m/s and 1.61×10^{-5}m/s have been used to size the soakaways.

Whilst no groundwater was encountered during the tests conducted in May 2021, previous tests conducted in November 2020 confirm that groundwater was encountered between 1.08m-1.32mbgl.

We have the following comments to make regarding the current surface water drainage proposals:

- Soakaways should not be located beneath the access road. Soakaways used to drain the access road should be located in public open space. Alternatively, permeable paving could be used.
- Consideration of groundwater seepage –Based on the groundwater levels observed in November, we have significant concerns regarding the future liability to the highways authority due to a risk of ice forming on the highway as a result of overland flows. It is unclear how the proposed soakaways, to be located at depths of more than 1.5m bgl, will function during periods of high groundwater levels. The surface water strategy will need to be reconsidered, which may involve the redesign of the site.

It should be noted that soakaways should be located a minimum of 5m from building foundations and offset from the road. The base of soakaways and unlined storage/conveyance features should be a minimum of 1m above groundwater levels and must have a half drain time of no greater than 24 hours.

The Applicant must confirm the proposed adoption and maintenance arrangements for the surface water drainage system, particularly for shared features. The Drainage Layout plan should reflect the ownership of the respective drainage components.

Foul Water Drainage

We understand that 5 shallow percolation test pits were excavated to depths ranging between 0m-0.6m BGL. The acceptable Vp results ranged between 23.3-40.

We note the proposal for each dwelling to have its own package treatment plant which will discharge to a shared drainage field located on adjacent land within the applicant's ownership. We recommend that each dwelling has its own package treatment plant and drainage field. **However, should a shared drainage field still be proposed outside of the red line boundary, an easement will be required to allow for homeowners to access the drainage field for future management and maintenance.**

It is mentioned that a topographic survey will be conducted to confirm the land elevations and to inform the pipe depths. It is likely that the sloping topography from south to north will allow the treatment plants to discharge to the drainage field via gravity.

In accordance with Policy SD4 of the Core Strategy, **the Applicant should provide a foul water drainage strategy showing how it will be managed.**

Overall Comment

We understand that this planning application is related to Condition 2 of the Decision Notice for 193027. We were not consulted as part of the 193027 planning application. Following a review of the available information, prior to discharging conditions 16 and 17 of the Decision Notice for 193027, we object to the surface water drainage proposals on the basis of a future risk of ice on the access road and highway as a result of groundwater seepage. It is unclear how the proposed soakaways, to be located at depths of more than 1.5m bgl, will function during periods of high groundwater levels.