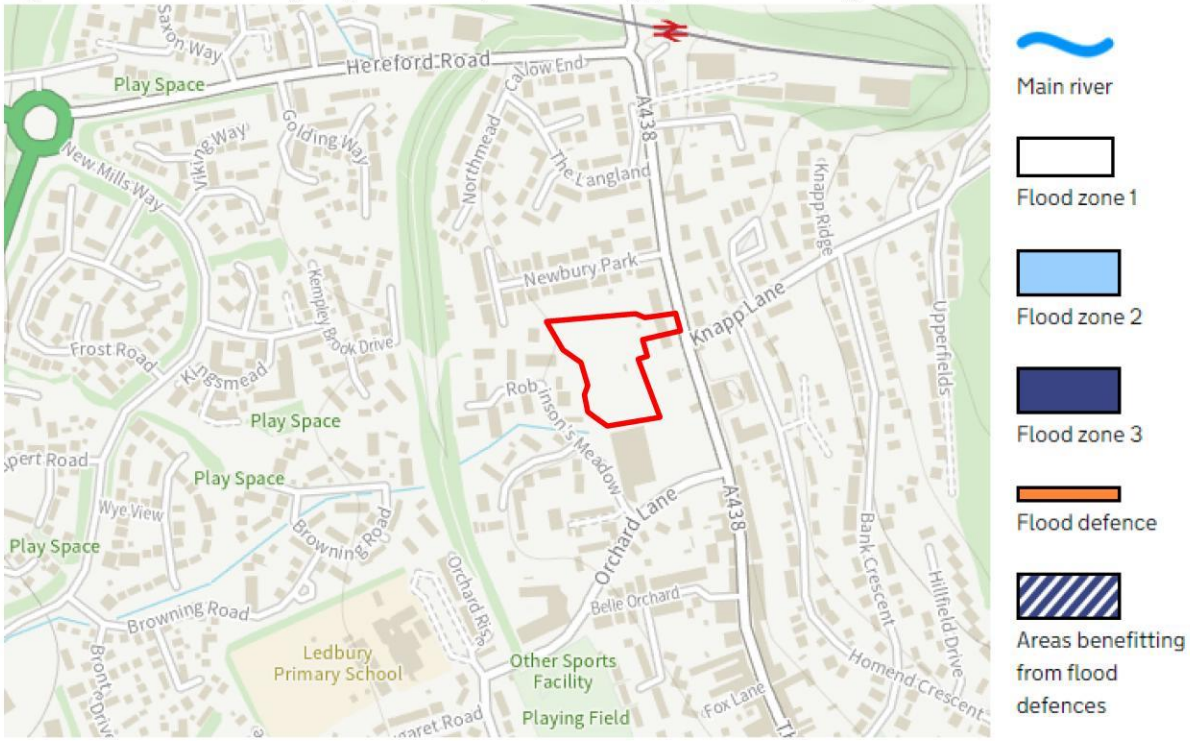
SITE:	Building and curtilage of Greenacres bungalow, and Land to the rear of The Knapp and Westmead, The Homend, Ledbury, Herefordshire
TYPE:	Planning Permission
DESCRIPTION:	Proposed demolition of existing buildings on site and erection of Retirement Living apartments with associated access, car parking, landscaping, ancillary facilities, and associated works.
APPLICATION NO:	223248
GRID REFERENCE:	OS 370828, 238262
APPLICANT:	Ms Gallagher
AGENT:	Rachel Clare

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

- Application for Planning Permission;
- Location Plan (Ref: MI-2822-02-AC-0000 A);
- Site Plan (Ref: MI-2822-03-AC-0001 I);
- Drainage Strategy (Ref: MI-2822-03-DE-101);
- Levels Strategy (Ref : MI-2822-03-DE-100);
- Planning Statement;
- Covering Statement;
- Phase I Site Appraisal;
- Phase II Site Appraisal;
- Planning Obligations Letter;
- Flood Risk Assessment;
- Drainage Statement.

Site Location

Figure 1: Environment Agency Flood Map for Planning (Rivers and Sea), June 2022



Overview of the Proposal

The Applicant proposes the demolition of an existing bungalow and the construction of 53 Retirement Living apartments (32 x 1-bed and 21 x 2-bed). The site covers an area of approx. 1.004ha and is currently greenfield. An ordinary watercourse flows approx. 60m to the southwest of the site. The topography of the site slopes down from east to west by approx. 10m.

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 probability Flood Zone 1.

As the proposed development is more than 1ha, in accordance with Environment Agency standing advice, the planning application will need to be supported by a Flood Risk Assessment (FRA) undertaken in accordance with National Planning Policy Framework (NPPF) and its supporting Planning Practice Guidance. 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

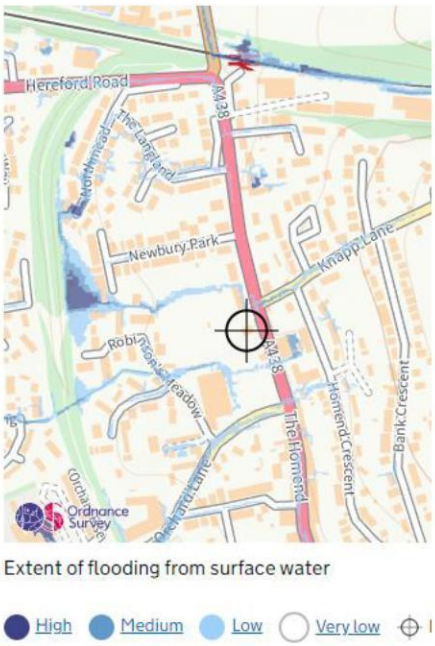
**except for changes of use to a more vulnerable class, or where they could be affected by other sources of flooding*

The FRA prepared to support the planning application should include an assessment of risk associated with all sources of flooding, in accordance with the NPPF. This should include considerations of surface water, groundwater, sewers, reservoirs and any other manmade sources. The management of the additional surface water runoff generated by the proposed development should also be considered.

Surface Water Flood Risk

Review of the EA's Risk of Flooding from Surface Water map indicates that the majority of the site is not at risk of surface water flooding, however there are two low risk surface water flow routes across the site. Runoff in these areas should be considered within the design of the development.

Figure 2: EA Surface Water Flood Risk Mapping, June 2022



Other Considerations

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

Surface Water Drainage

Infiltration testing has not yet been undertaken onsite. This must be conducted in accordance with BRE 365 to determine whether a surface water discharge to ground is viable. Alternative onsite ground investigations have taken place whereby excavations up to 4mBGL have been conducted. No groundwater was encountered in any of the holes except on one occasion where groundwater was found at 1.5mBGL.

We understand that the current surface water drainage proposals involve an attenuated and restricted offsite discharge to a watercourse located to the southwest of the site. The proposed outfall is within the site boundary. Should a discharge to ground be proven unviable, this is an acceptable proposal in principle.

The surface water from the proposed building will be attenuated in a cellular storage tank which has been sized for a 1 in 100yr + 40% CC event. The proposed volume of 197m^3 will be adequate given that the required volume was found to be 190.1m^3. A hydrobrake is proposed to limit the offsite surface water discharge to 2l/s via a 67mm diameter orifice. An orifice larger than 70mm is favourable to mitigate the risk of blockage so this should be considered within the design of the system.

We also note proposals for the parking area to be constructed from tanked permeable paving which will reduce any potential surface water runoff from the site. The water collected in the tanked permeable paving will be directed towards the cellular storage tank and will ultimately discharge to the watercourse via the hydrobrake.

For the main site access road/driveway, we assume this is to be constructed of impermeable materials given that numerous road gullies are proposed along its length. The gullies are proposed to drain into the main surface water drainage system including the cellular tank.

We note that the system (attenuation tank) is sized for an impermeable area of 0.3ha. However, the roof area of the proposed building and total area of impermeable surfaces is unclear. These must be clarified to ensure the surface water drainage system has been designed appropriately.

The maintenance arrangements for the surface water drainage strategy have been clarified.

Foul Water Drainage

We note proposals for the foul water to discharge to the Severn Trent public foul sewer located to the east of the site in The Homend. Severn Trent have confirmed they have no objection to the proposed connection. We understand that a pumping station with associated rising main will be required to achieve this discharge. Pumped discharges are not favourable, however we note that the infrastructure would have to be constructed to adoptable standards with 24 hours of additional storage.

The pumping station presents a risk of foul flooding and so should be eliminated from the design if possible.

We are aware of another public foul sewer located to the southwest of the site (in Robinson's Meadow) whereby a gravity fed discharge may be achievable. This potential connection point must be investigated and prioritised over the pumped solution.

We note the proposals for 53 apartments. If these apartments are sold in the future, then the future owners would need to pay sewerage charges to Severn Trent Water. In such a case the foul drains serving the apartments should become public assets. The foul drainage strategy needs to consider the future scenario when assets managed by a private management company need to be transferred to

Severn Trent Water. Any proposals for a Sewage Pumping Station would need to meet the approval of Severn Trent in case ownership of the pumping station is transferred to Severn Trent in the future.

Owing to the size of the development according to Sewers for Adoption, a Type 3 station would be required. This would need to be located at least 15m from habitable buildings. The drainage layout shows the pumping station too close to buildings and so the proposals will need to be reconsidered. Vehicular access for tankers would also be required in case the pumps fail.

Overall Comment

We recommend that the following information is provided prior to the Council granting planning permission:

- Confirmation of the areas of the building roof and impermeable surfaces.
- Clarification of whether a gravity fed connection to the public foul sewer is possible, noting our comments on the proposals for a pumping station.