



Northamptonshire County Council  
Lead Local Flood Authority

<b>Local Planning Authority</b>	South Northamptonshire Council
<b>Application Reference</b>	S/2017/2577/EIA
<b>Proposal</b>	Outline application for a residential development of up to 525 dwellings, open space, children's play area and associated infrastructure (Application accompanied by an Environmental Statement)
<b>Location</b>	Land North of Newport Pagnell Road Hackleton
<b>Consultation Date</b>	26 <sup>th</sup> October 2017
<b>Response Date</b>	12 <sup>th</sup> November 2017

Dear Daniel,

Thank you for consulting us on the above planning application.

Having reviewed the submitted surface water drainage information located within Flood Risk Assessment document reference 20168/06-17/3941 Rev A, dated September 2017, Prepared by Mewies Engineering Consultants Ltd. we would advise that **there is insufficient information available to comment on the acceptability of the proposed surface water drainage scheme for the proposed development.**

Our information requirements in support of an outline application are outlined in our document Local Standards and Guidance for Surface Water Drainage in Northamptonshire document: <https://www.floodtoolkit.com/wp-content/uploads/2017/09/Local-Standards-for-publication-v1.3-September-2017.pdf>. With reference to this document, we note that the submitted surface water drainage information fails on the following grounds:

- 1) From section 1.2, Table 2 and Microdrainage file 2015-04-24 of the above FRA we are unsure of the site area.
- 2) Surface water drainage attenuation basins should be designed for the 1/200 year plus climate change event as stated in section 4.16 of the FRA however Appendix I refers to storage volumes for the 1/100 year event.



- 3) Appendix I refers to final discharge of surface water drainage from the development into existing watercourse which connects to Anglian Water existing manhole 6551. Evidence of existing watercourse capacity & permission to discharge is not provided.

Also the developer will need to consult the Bedford Group of Internal Drainage Boards for consent for all works within 9m of an ordinary watercourse. Further information can be found at: <http://www.idbs.org.uk/documents/>

A 9m buffer should be maintained between the edge of the watercourses for the maintenance access of relevant building and structures. All the building and structures should be located outside of the area of flood risk

- 4) Appendix I refers to proposed surface water drain connection between existing watercourse ditch and Anglian Water existing manhole. From the current drainage strategy it is not clear the land between the existing watercourse and proposed outfall connection falls within the development ownership, in this case details or permission to cross third-party land will be required.
- 5) Section 4.23 & Appendix F refers to final discharge to Anglian Water existing manhole 6551. However, Appendix I refers to final discharge to Anglian Water existing manhole 0751. The capacity of this manhole is unknown and requires permission from concerned authority.
- 6) In calculations proposed values of impermeable area should include a 10% allowance for Urban Creep, as taken from CIRIA C753 (version 6) paragraph 24.7.2

### **Overcoming our concerns:**

Our concerns can be overcome by submitting surface water drainage information which covers the deficiencies highlighted above.

We ask to be re-consulted on this requested surface water drainage information. We will provide you with bespoke comments within 21 days of receiving a formal re-consultation. We cannot support the application until adequate surface water drainage information has been submitted.

Upon submission of revised surface water drainage information we may deem that the impacts of surface water drainage have been adequately addressed, pending the imposition of any relevant planning conditions or we may consider that the nature of the proposal, drainage solution or information submitted remains insufficient to overcome our concerns.

Please note that our comments only cover the surface water drainage implications of the proposed development. If you are minded to approve the application contrary to any outstanding concerns, I would be grateful if you could notify us, to give us the opportunity to make further representations.

In the event that the applicant appeals a refusal of their planning application or non-determination, we would be prepared to fully support Local Planning Authority and provide evidence at any public inquiry or informal hearing in relation to surface water drainage matters.

In view of above, should you require any further information, or wish to discuss these matters further, please do not hesitate to contact us.

Yours Faithfully,

Malcolm Ball

Technician

For & Behalf of Northamptonshire County Council – Lead Local Flood Authority

**Disclaimer:**

**This response is made by the County Council in its capacity as a Lead Local Flood Authority as a statutory consultee. As a Lead Local Flood Authority (LLFA) we respond to Planning Applications considering where development has the greatest ability to affect flood risk. For the avoidance of doubt we do not comment on water quality, contaminated land/landfill, waste water, risk of flooding from ground water, biodiversity and ecological impacts, fisheries, water framework directive, amenity, health & safety, or navigation.**

**These comments should be taken as general comments on surface water drainage only. A detailed review of any technical assessments, methodology and results has not been undertaken by the LLFA. Liability for such technical work therefore rests with organisation(s) who have undertaken this technical work and the Local Planning Authority responsible for the planning decision.**