



Northamptonshire County Council  
Lead Local Flood Authority

<b>Local Planning Authority</b>	South Northamptonshire Council
<b>Application Reference</b>	S/2019/1728/FUL
<b>Proposal</b>	Conversion of existing buildings to residential development of 15no. dwellings including associated parking
<b>Location</b>	Towcester Conservative Club 152/154 Watling Street East Towcester NN12 6DB
<b>Consultation Date</b>	11 <sup>th</sup> September 2019
<b>Response Date</b>	01 <sup>st</sup> October 2019

Dear Maria,

Thank you for consulting us on the above planning application.

Having reviewed the applicant's submitted information, 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.**

In particular,

The application lies within Flood Zone 1 defined by the Technical Guide to the National Planning Policy Framework (NPPF) as having a low probability of flooding from rivers. However the proposed development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. Footnote 50 of paragraph 163 of the NPPF (2019) requires applicants for planning permission to submit an FRA when development on this scale is proposed in such locations.

Paragraph 165 of the NPPF (2019) refers to Major development. Northamptonshire County Council as Lead Local Flood Authority requires submission of a Drainage Strategy for all Major development.

A Drainage Strategy / FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risks resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission.

In particular,

We provide the following advice on FRAs:

Surface Water Drainage, Northamptonshire County Council

Angel Square, Northampton NN1 1ED

w. [www.floodtoolkit.com](http://www.floodtoolkit.com)

t. 01604 367805

e. [swdrainage@northamptonshire.gov.uk](mailto:swdrainage@northamptonshire.gov.uk)



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- 1) A drainage strategy must be submitted which includes supporting calculations to demonstrate that runoff will not be increased as a result of this development.

It is also advisable for the developer to check the LLFA's website Flood Toolkit on requirement of the FRA at the Full Application stage. Please see below a link of our website showing the above requirements :

<https://www.floodtoolkit.com/wp-content/uploads/2017/09/Local-Standards-for-publication-v1.3-September-2017.pdf>

This sets out what we would required to be submitted as a part of Full planning application. This states that BRE 365 infiltration tests are required where discharge to ground via infiltration is proposed, and land ownership records or other agreements with the landowners provided for discharge to watercourses not within the site boundary.

- 2) If it is proposed to discharge the surface water into any public surface water sewer, a confirmation of the allowable rate of discharge and point of discharge should be provided from the relevant water authority. Please note that the rate and point of discharge set by the water company may have implications on the overall drainage scheme for the site and may need to be revised based on their requirements
- 3) The maintenance and/or adoption proposal for every element of the surface water drainage system proposed on the site should be considered for the lifetime of the development.

**Informative:**

Section 24.2 of the SUDS Manual (CIRIA C793) refers to Development Runoff. Within this Section, it is acknowledged that additional datasets have been added to Flood Estimation Handbook (FEH) and rainfall depths obtained using FEH show significant differences from those obtained from Flood Studies Report (FSR) in some parts of the country. Within Northamptonshire, rainfall depths are often greater using more up to date FEH datasets than those using FSR therefore for various storm events, greater run-off is produced and additional attenuation is likely to be required.

FEH rainfall data is more up to date than FSR (England and Wales) therefore calculations should use this FEH data to determine the volume of surface water attenuation required on site. We recognise there are uncertainties associated with the use of any datasets. In particular, FSR rainfall data should be used where the critical storm is less than 60 minutes as FEH data is less

robust for short duration storms. FEH rainfall data can be used to determine the volume of storage required if the critical storm is greater than 30 minutes.

If FEH rainfall data is not used as described above, then sensitivity testing to assess the implications of FEH rainfall must be provided. This should demonstrate that the development proposals remain safe and do not increase flood risk to third parties.

Climate change.

In terms of how we would expect all drainage designs to consider the new climate change guidance, we would suggest the following. Under the new guidance, developers should design the surface water attenuation on site to accommodate the 1:100year +20% cc and undertake a sensitivity analysis to understand the flooding implication for the 40% cc. If the implications are significant i.e. the site could flood existing development (additional flow of runoff from the site) or put people at risk (by increased hazard levels within or off the site) then a view may be taken to provide more attenuation working up towards 40% cc, or to provide additional mitigation allowances, for example a higher freeboard to ensure no risk to third parties/onsite users for the extreme 40% cc scenario. This will tie into existing principles for designing for exceedance.

#### **Overcoming our concerns:**

Our concerns can be overcome by submitting surface water drainage information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible, actively reduces flood risk overall.

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 the 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

Drainage Engineer

For and on 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.**