



## Northamptonshire County Council

Tim Planning Inspector  
Room 3D Eagle Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN.

Please ask for: Malcolm Ball  
Tel: 01604 367805  
Our ref: S/2020/0930/MAO  
Your ref: APP/Z2830/W/20/3265715  
Date: 30<sup>th</sup> March 2021

### **For the Attention of: The Planning Inspector**

Dear Sir/Madam,

#### **Town and Country Planning Act 1990 (As Amended)**

**Application Reference :** S/2020/0930/MAO

**Appeal Reference :** APP/Z2830/W/20/3265715

**Proposal** Outline Planning Application for up to 35 (maximum) residential dwellings including access with all other Matters Reserved

**Location** Land South of Station Road Blisworth Northamptonshire NN7 3DN

In our response of 1<sup>st</sup> July 2020 we made the following comments,

Having reviewed the submitted surface water drainage information located within:

1) Flood Risk Assessment, dated May 2020, & prepared by Flood Risk UK.

We would advise that if the following planning conditions are included as set out below, the impacts of surface water drainage will have been adequately addressed at this stage. Without these conditions, the proposed development on this site may pose an unacceptable risk of surface water flooding.

#### Condition

No development shall take place until full details of the surface water drainage scheme for the site, based on the approved Flood Risk Assessment, dated May 2020, & prepared by Flood Risk UK have been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details. These shall include:

**Surface Water Drainage, Northamptonshire County Council**  
1 Angel Square  
4 Angel Street  
Northampton NN1 1ED  
[www.floodtoolkit.com](http://www.floodtoolkit.com)  
t. 01604 367805  
e. [Maball@northamptonshire.gov.uk](mailto:Maball@northamptonshire.gov.uk)



Northamptonshire  
County Council

a) Details (i.e. designs, diameters, invert and cover levels, gradients, dimensions and so on) of all elements of the proposed drainage system, to include pipes, inspection chambers, outfalls/inlets and attenuation basins. Details of the drainage system are to be accompanied by full and appropriately cross-referenced supporting calculations.

In all 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

b) Cross sections of all control chambers (including site specific levels mAOD) and manufacturers' hydraulic curves for all hydrobrakes and any other flow control devices.

c) Demonstration that for events with a return-period in excess of 3.3% (1in30), exceedance flow routes are appropriately routed such that there is no residual risk to property and critical infrastructure.

#### Reason

To prevent the increased risk of flooding, both on and off site, by ensuring the satisfactory means of surface water attenuation and discharge from the site.

#### Condition

No development shall take place until a detailed scheme for the maintenance and upkeep of every element of the surface water drainage system proposed on the site has been submitted to and approved in writing by the Local Planning Authority and the maintenance plan shall be carried out in full thereafter. This scheme shall include details of any drainage elements that will require replacement within the lifetime of the proposed development.

#### Reason

In order to ensure that the drainage systems associated with the development will be maintained appropriately and in perpetuity, to reduce the risk of flooding due to failure of the drainage system.

#### Condition

All subsequent reserved matters applications shall make reference to the original approved Flood Risk Assessment, dated May 2020, & prepared by Flood Risk UK and shall be accompanied by a certificate of compliance with the original approved scheme. In addition, an accompanying revised and updated Flood Risk Assessment with full drainage details shall be submitted with each future reserved matters application, indicating whether any further works are required. Development shall be implemented in accordance with the originally approved scheme or the updated scheme as approved in writing by the Local Planning Authority pursuant to that application.

#### Reason

In order to ensure that the drainage details are implemented in accordance with the approved Flood Risk Assessment, and to prevent the increased risk of flooding, both on and off site, by ensuring the satisfactory means of surface water attenuation and discharge from the site.

#### Condition

No Occupation shall take place until a Verification Report for the installed surface water drainage system for the site based on the approved Flood Risk Assessment, dated May 2020, & prepared by Flood Risk UK has been submitted in writing by a suitably qualified independent drainage engineer and approved by the Local Planning Authority The details shall include:

- a) Any departure from the agreed design is keeping with the approved principles
- b) As-Built Drawings and accompanying photos
- c) Results of any Performance testing undertaken as a part of the application process (if required / necessary)
- d) Copies of any Statutory Approvals, such as Land Drainage Consent for Discharges etc.
- e) CCTV confirmation that the system is free from defects, damage and foreign objects.

#### Reason

To ensure the installed Surface Water Drainage System is satisfactory and in accordance with the approved reports for the development site.

As you are aware, the discharge of planning conditions rests with the Local Planning Authority. It is, therefore, essential that you are satisfied that the proposed draft conditions above meet the requirements of paragraph 4 of the National Planning Practice Guidance (Use of Planning Conditions, section 2). Please notify us immediately if you are unable to apply our suggested conditions, as we may need to tailor our advice accordingly.

#### Informative:

##### FSR/FEH

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.

#### Upper Nene Catchment

Following the significant flooding to Northampton town centre in Easter 1998 improvements were made to the defences along the River Nene. In order to secure the level of protection afforded by the new defence we have agreed with the West Northants Joint Planning Unit that the standards set for new development should also be improved, beyond industry standards.

Therefore all new development in the Upper Nene catchment will be designed for a flood with a 0.5% probability(1 in 200 chance) occurring in any year, including an appropriate allowance for climate change. This includes design of mitigation for Main River flooding and any surface water attenuation. This applies across the whole of the Upper Nene catchment including all branches and arms of the Nene, upstream of Billing Aquadrome, and all tributaries such as Wootton Brook, Dallington Brook and Bugbrooke Brook.

This is supported by a document we produced "Strategic Review of development and flood risk, Nene catchment Northampton and upstream" and reinforced more recently in the West Northamptonshire Strategic Flood Risk Assessment (SFRA) Level 1 (February 2009).

[http://www.westnorthamptonshirejpu.org/gf2.ti/f/278178/6412997.1/pdf/-/sfra\\_l1\\_v1.pdf](http://www.westnorthamptonshirejpu.org/gf2.ti/f/278178/6412997.1/pdf/-/sfra_l1_v1.pdf)

Please note that our comments only cover the surface water drainage implications of the proposed development.

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.

As you will no doubt ensure that these concerns, as detailed within our letter 1<sup>st</sup> July 2020, to the relevant planning authority, were forwarded to you in respect of this appeal. I am however attaching the same for your information

Hope the above is helpful. Please do not hesitate to contact us should you have any queries with regards to the above.

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 Sincerely,

Malcolm Ball

Senior Engineer

For and on behalf of NCC