

Drainage Statement of Common Ground – 13/12/24

Background

1. The parties agree that Outline Planning Applications DC/24/0771/OUT and IP/24/00172/OUT were accompanied by information in relation to Flood Risk and Drainage, in the form of the Flood Risk Assessment and Sustainable Drainage Strategy report prepared by LDE RSK dated February 2024. That document includes a Surface Water Drainage Strategy (Appendix I) and additional details (Appendix J).
2. The LLFA submitted a Holding Objection on 30th April 2024, covering 9 points of objection.
3. The purpose of the Holding Objection was “... to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection.”
4. A response to the LLFA’s holding objection was prepared and issued by the Applicant on 22nd May 2024, but the application was refused on 4th June.
5. In its Statement of Case on this matter, Suffolk County Council state the following:

“SCC LLFA acknowledges the further information provided in May 2024, responding to the points the LLFA raised. Although not formally consulted on it, SCC LLFA has considered this information and considers a number of the concerns resolved, namely points 1, 2, 3 & 4 of the from the LLFA’s original 9 points of objection in the consultation response. The information required to satisfy the remaining points, 5, 6, 7, 8 and 9, and the specific reasons for the objection are set out in the following section.”

Relevant Guidance

6. The parties agree that the relevant guidance from the Lead Local Flood Authority in respect of the design of surface water drainage systems is that contained in the Suffolk Flood Risk Management Strategy Appendix A, entitled “Sustainable Drainage Systems (SuDS): A Local Design Guide” (dated 2023).

Points Agreed

7. The parties agree that the site lies within Flood Zone 1.
8. The parties agree that the EA’s surface water flood mapping shows that the only area of the site impacted by surface water flooding is a topographical depression located within the easternmost corner of the site in the junction between Humber Doucy Lane and Severn Cottages Lane. This is a low-risk area and appears to originate from runoff from Humber Doucy Lane and other nearby roads due to a slope in either direction (from north and south) spilling over into the site. The Appeal Scheme does not propose any development within that area, and the parties therefore agree that no part of the built development is vulnerable to existing surface water flooding.
9. The parties agree OS mapping, IDB mapping and EA mapping do not indicate any further ‘watercourse’ features bounding the application site. Within the site, the western ditch and southern ditch (along Humber Doucy Lane) are marked on the existing topographical survey. Both

fall towards the southeastern corner of the application site. There is no evidence that the southeastern corner of the site has any connection to an external watercourse, and therefore the on-site drainage effectively terminates at this point.

10. Accordingly, the parties agree that as there is no connection between the on-site drainage and any off-site watercourse, then subject to suitable on-site attenuation and discharge, the proposed development cannot have any impact on off-site watercourses. In addition, because there is no connection between the ditch network on-site and any off-site watercourses, the LLFA's preferred means of disposal via discharge to an off-site watercourse is not available.
11. With regard to the drainage hierarchy on page 11 of the SuDS Guide, the parties agree:
 - Rainwater harvesting should be provided within the scheme but is not practical as the sole option for dealing with surface water for a development of this scale;
 - Shallow infiltration is not suitable, as demonstrated by the Site Investigation/FRA;
 - Gravity discharge to a watercourse is not possible for the reasons given above;
 - Gravity discharge to a surface water/combined sewer is not appropriate in this instance. The pre-development enquiry to Anglian Water confirmed that discharge to the local sewer network on Humber Doucy Lane would "significantly increase the risk of flooding and pollution from the receiving network and potentially to compromise the ability of assets to operate within statutory enforced permitted limits".
12. The parties therefore agree that in the absence of the above alternatives, deep infiltration, as proposed in the submitted Drainage Strategy, is the most suitable and sustainable option for managing surface water.
13. The above areas of agreement are the reason why the LLFA is now satisfied that the points 1-4 of its Holding Objection have been satisfactorily addressed.
14. The parties agree that the Appeal Site is 31.52 ha in area and is 0% impermeable (para 7.2 of the FRA).
15. The parties agree that the methodology used to calculate the infiltration rates, as shown in Tables 3.2 & 3.3 of the FRA, is appropriate.
16. The parties agree that sufficient attenuation for all events up to the 1% AEP event inclusive of 45% climate change (para 7.3 of the FRA) is the correct approach.
17. The parties also agree that the general locations of the strategic attenuation areas are appropriate in principle and that technically it is acceptable to the LLFA for on-site Green Infrastructure to provide dual use for recreation and surface water management if appropriately designed.
18. The parties agree that, because the Drainage Strategy treats the Early Years setting as part of the development parcel within which it sits, and as none of the development parcel are proposed to be subject to any flow restriction under the submitted Drainage Strategy, point 8 of the LLFA's Holding Objection is also resolved.

19. The parties agree that the approach to network modelling in regards to using the latest FEH data and a CV of 1 is acceptable.
20. The Parties agree that the revised Surface Water Drainage Strategy (Rev.P02) acceptably sets out the principles to be used in the delivery of future parcels of the wider site and thus sufficiently addresses point 5 of the original LLFA response.

Matters Not Agreed

21. The parties do not agree that the network modelling output is acceptable at this stage as the LLFA considers that, with the exception of the matters referred to above the drainage modelling outputs do not support a scheme that fully meets LLFA criteria at this time and revised modelling will need to be undertaken to support a compliant scheme that suitably reflects the land take requirement to meet LLFA Appendix A guidance. The Appellant considers that the drainage strategy does provide sufficient information for the Inspector to be satisfied that an appropriate surface water drainage strategy can be delivered.
22. The parties do not agree that the correct volume of attenuation is provided. Partly due to modelling outputs not being agreed and primarily due to the Northern basins having what the LLFA considers to be an excessive water level in the current modelling that does not meet their Appendix A guidance.
23. The parties do not therefore agree that the Surface Water Drainage Strategy provided at Appendix I of the FRA provides the requisite information required to satisfy the decision maker that the surface water would be appropriately managed in accordance with its Design Guide.

Summary point

Following further discussion, the Appellants have produced a revision of the Surface Water Drainage Strategy, which works towards but does not fully agree points 6, 7, and 9 which require further supporting information.

Signatures

ON BEHALF OF LEAD LOCAL FLOOD AUTHORITY

A black rectangular box redacting the signature of Benjamin Locksmith.

Name...Benjamin Locksmith.....

Dated...13-12-2024.....

ON BEHALF OF IPSWICH BOROUGH COUNCIL

Signed.....

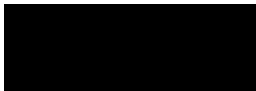


Name.....James Mann

Dated.....13-12-2024

ON BEHALF OF EAST SUFFOLK COUNCIL

Signed.....

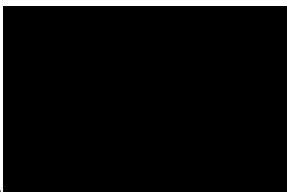


Name.....Kathryn Oelman

Dated.....13-12-2024

ON BEHALF OF THE APPELLANTS

Signed.....



Name.....Thomas Rhys Fillingham (RSK Land and Development Engineering Ltd)

Dated.....13-12-2024