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**Lead Local Flood Authority
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Contact: SuDS and Watercourses Team
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Date 18 June 2025

Dear Ms McDonald

RE: 25/00592/DOC - Details reserved by condition 17 (Drainage) of planning permission reference no 24/02563/S73 granted 10 January 2025 - Land at Turnpike Lane and Adjacent to 4 Manor Close Turnpike Lane Ickleford

Thank you for your consultation on the above site, received on 13 March 2025. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 17.

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

1. We note that it appears that FSR rainfall data may have been used in the soakaway calculations which have been provided. This should be clarified, as we no longer accept the use of FSR and would expect FEH13 or 22 to be used instead.
2. We note that one of the geocellular soakaways is proposed across a number of private gardens (plots 4, 5 and 6) - this provides a potential maintenance risk. Further information should be provided to show that there are no other viable options. If this is the only viable location, then it should be demonstrated how access and arrangements for future maintenance would be achieved.
3. The submitted drainage report references a site investigation which took place in July 2024. We ask that the report associated with this site investigation is submitted – this

allows us to verify the infiltration rates and groundwater level which has been taken forward into the design.

Informative

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

Yours sincerely

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Report: Civil Engineering Design Calculations, Structa, January 2025

For reference, condition 17 wording is as follows:

Prior to the first occupation of the development hereby permitted, surface water drainage works shall have been implemented in accordance with details that shall first have been submitted to and approved in writing by the LPA. Before any details are submitted to the LPA an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system, having to Defra's non-statutory technical standards for sustainable drainage systems (or any subsequent version), and the results of the assessment shall have been provided to the LPA. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;*
- ii. Include a timetable for its implementation; and,*
- iii. provide, a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.*

Reason: To prevent surface water flooding. LP Policy NE8.