

via e-mail

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LPA Ref: PF/22/1928
Date: 06 July 2023
NCC Member: Cllr Judy Oliver

LLFA Ref: FW2023_0492
Tel No.: 0344 800 8020
Email: llfa@norfolk.gov.uk

Dear Mr Lyon,

Town and Country Planning (Development Management Procedure) (England) Order 2015

Full Planning Application: Revised scheme for the erection of 62. no retirement dwellings, access, roads, open space, parking areas and associated works at Land South of Sheringham House, Cremers Drift, Sheringham, Norfolk.

Thank you for your consultation on the above site, received from the Local Planning Authority (LPA) on 31 May 2023. The County Council, as Lead Local Flood Authority (LLFA), have reviewed the application as submitted.

This is an application for full planning permission. The development type is residential.

Prior to this reconsultation, the LLFA have provided advice both in and independent of our role as a statutory consultee to the planning application process. A summary of LLFA involvement is as follows:

- LLFA Consultation Response Letter | LLFA Ref: FW2022_0827 | Status: Statutory formal advice | Recommendation: Objection | Dated: 21 October 2022
- Meeting (requested by applicant) | LLFA Ref: N/A | Status: Non-statutory informal advice | Recommendation: N/A | Dated: 02 December 2022
- Meeting (requested by LPA) | LLFA Ref: FW2023_0082 | Status: Statutory formal advice | Recommendation: N/A | Dated: 08 February 2023

We are now being reconsulted for further advice. The applicant has now provided the following additional and/or revised information to account for flood risk and drainage aspects of the planning application:

- Document Title: Flood Risk Assessment and Drainage Strategy | Author: Canham Consulting Ltd | Ref: 218852-00-XX-XX-RP-C-05000 | Rev: P1 | Dated: 24 May 2023

To the best of our understanding, any revised documents/drawings are to supersede the previous revisions with the same titles or references. It is our understand that the above report supersedes all previously submitted information pertaining to flood risk and drainage aspect of the planning application.

We note that the report refers to supporting documents and drawings, some of which have been provided as appendices, but not all. Where these have been referenced in the flood risk assessment and drainage strategy report, we have cross-referenced against this information. You should ensure that all supporting information is uploaded to the planning portal to inform the planning application. If any information has not been provided, we request we are reconsulted so we can provide comments and advice.

Where possible, we have cross-referenced our review with overarching development documents and plan drawings to ensure flood risk and drainage proposals correlate. If the applicant wants information outside of the flood risk assessment and drainage strategy report to be considered for flood risk and drainage aspects of the planning application, we request they indicate this through a form of summary document to signpost the LLFA to applicable documents and/or drawings. We rely on the applicant to ensure the proposals correlate across all aspects of the submission.

At this stage, our comments and advice are formed from a preliminary assessment against expected criteria for an application for full planning permission. Where we believe there is scope for significant revisions or additional information to be submitted, the LLFA feel it is counterproductive to provide a detailed review in our role as a statutory consultee at this time. Once the broader principles have been scoped sufficiently, we can advise on the finer aspects of the drainage strategy.

Our comments and advice are as follows:

- Ahead of this response letter we provided provisional advice to you via a short meeting, scoping interim findings ahead of this written response (Dated: 21 June 2023). With an extension of time, we have now had an opportunity to review the submitted information further.
- From our preliminary assessment, we are not satisfied that the submitted information sufficiently addresses relevant national and/or local policy, frameworks, strategies, guidance (including best practice) and/or statutory/non-statutory standards pertaining to flood risk and drainage aspects.
- We have highlighted some of the overarching, broader principles of the flood risk assessment and drainage strategy that we believe have a significant impact on the overall proposals:

SuDS feature suitability, overall design and deep infiltration depth:

- The drainage design modelling has been designed with pre-development levels rather than re-graded finished ground levels. The site has steep gradients and hummocky topography which we believe are likely to be

lowered to allow for the development. This is unrepresentative of the post-development site.

- We have reservations with the drainage design modelling (input parameters, infiltration rates used, rainfall data used, naming convention etc). We are not in agreement that this best represents the post-development scenario in accordance with expected standards.
- The features have not been proposed with suitable offsets for protection of foundations. Some features have been placed in areas of existing trees which are listed to be retained (also outside of the red line boundary). We are not in agreement that best practice standards have been adopted.
- We query the suitability of permeable paving on a sloped site with no consideration for gradient impact on the collection effectiveness and storage abilities.
- We stress that deep infiltrating features are being used to achieve a functioning infiltration design. The soakaway feature in the west of the site has an invert level exceeding 2.00mbgl. This is not acceptable.

Drainage hierarchy and viability:

- Rainwater re-use/harvesting has not been utilised as a complimenting component to the drainage scheme.
- We believe that the referenced Micro Geotechnical Report from October 2021 is missing from the submission. We are unable to locate where the test locations for results shown in Table 5 have been positioned. We are unable to ensure testing has been conducted at the correct depth, in the location of infiltrating features and the BRE365 standards. From the current information provided, we believe all testing has been conducted at deep infiltration depths (exceeding 2.00mbgl).
- The rates proposed are feasible for an infiltration design, albeit they are on the lower side of favourable. An appropriate factor of safety should be considered on the design of features with these types of rates. We question whether these rates are representative of all the features proposed.
- We have reservations with how this testing has been extrapolated to represent the site infiltration potential. The single results have been used to represent large zones of the site. The methodology behind this needs to be justified.
- We stress earlier points related to deep infiltration.
- The applicant states, “we would recommend progressing with the results of the results from Table 5 but would look to confirm this absolutely ahead of construction on site.” We advise this statement should be actioned now and further BRE365 testing should be conducted, in the location of the infiltrating features and their proposed invert, to better inform the design modelling.

Groundwater:

- This has not been scoped at a local (site) level.

- Ground investigations were conducted in September 2009 (Autumn) when results do not tend to be representative of peak levels.
 - Current excavations have been to a depth of 3.30mbgl via trial pits. Deeper excavations (via boreholes) should be carried out with an allowance for a period of groundwater monitoring to assure a resting water level is established.
 - We note the applicant has identified a spring on the north/northwest site boundary. This can be a direct correlation/indicator of groundwater conditions.
 - Subsequently, we are not assured a 1.20m unsaturated zone beneath the infiltrating features of the drainage system has been clearly confirmed.
 - Groundwater sensitivity should be of paramount with the site being within a Source Protection Zone 1 and 2. The Environment Agency should be consulted for comments on the proposals.
- It is important to note that a review of the proposals against criteria expected for flood risk and drainage aspects of the development tend to have cascading influence. Where we have reservations in one area of the submission, it will tend to have a direct impact on another area, meaning we are unable to agree sufficiency until alterations have been made.
 - To summarise, from a preliminary assessment of the submitted information in its current format, we are satisfied that the applicant has scoped and sufficiently addressed the following criteria:
 - Sequential Test/Sequential Approach
 - From a preliminary assessment of the submitted information in its current format, we are not satisfied that the applicant has scoped and sufficiently addressed the following criteria:
 - Supporting Detailed Flood Modelling
 - Drainage Hierarchy and Viability
 - Discharge Rates, Connections and Permissions and/or Consents
 - Drainage Scheme, SuDS Component Elements and Four Pillars of SuDS
 - Drainage Design Calculations/Modelling
 - Drainage Strategy Drawings
 - Drainage Features - Protection from all Sources of Flooding
 - Greenfield/Brownfield Runoff Rates (Pre- and Post-development)
 - Greenfield/Brownfield Runoff Volumes (Pre- and Post-development)
 - Urban Creep
 - Water Quality
 - General Mitigation and Freeboard Allowances
 - Exceedance Routes (Flood event greater than 1.0% AEP +CC event)

- Phasing Issues and Mitigation
- Maintenance and Management
- Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage Systems

We **maintain our objection** to this planning application in the absence of an acceptable flood risk assessment / drainage strategy / supporting information relating to:

- Insufficient information provided to demonstrate compliance with relevant national and/or local policy, frameworks, strategies, guidance (including best practice) and/or statutory/non-statutory standards.
- Submission of a flood risk assessment and drainage strategy that does not meet the standards expected by the LLFA in an application for full planning permission.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Once we are satisfied that the broader principles of the flood risk assessment and drainage strategy have been scoped and addressed sufficiently, we will be able to provide a more detailed review of the submission. Where reports or supporting information are to be superseded, this should be clearly indicated by the applicant. We suggest this could be through a covering summary letter or supporting summary report.

Comments, advice and recommendations made at this time are representative of the most current submitted information for the planning application. Where applicants vary drainage proposals at later stages the LLFA may amend the original comments, advice and recommendations accordingly. As such, the applicant must accept that submissions are open to further scrutiny from the LLFA and a revised assessment may be deemed necessary where drainage proposals have changed significantly.

Where planning applications are elongated over a period of time, the applicant must accept that the latter stages of the planning application may be subject to a revised assessment against the latest revisions of national and local policy, frameworks, strategies, guidance (including best practice) and statutory/non-statutory standards.

Further guidance on the information required by the LLFA from applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>.

If you, the LPA review and wish to determine this application against our advice you should notify us, the LLFA, by email at llfa@norfolk.gov.uk. Alternatively, if further information is submitted, we request we are reconsulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours sincerely,

Lewis Chappell
Flood Risk Officer

Lead Local Flood Authority

Disclaimer

We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.