Land South of Radwinter Road (East of Griffin Place)

Saffron Walden

Rosconn Strategic Land and Thomas Eric Baker and Sally Rose Hall, the Executors of Mr E C Baker and Mrs J Baker

Flood Risk & Drainage Statement

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1 Introduction

Context

1.1 Cotswold Transport Planning (CTP) (now Rappor Consultants) provided the Flood Risk Assessment (FRA) (CTP-20-1142-FRA-04 dated July 2021) inclusive of a Drainage Strategy to support the planning application (UTT/21/2509/OP) along with the applicable Environmental Statement chapter, (chapter 8) with the FRA provided as a chapter technical appendix.

1.2 This Flood Risk & Drainage Statement sets out the response to the comments provided as part of the Rule 6 Scott Schedule presented by Saffron Walden Town Council (SWTC) as part of the planning Appeal (APP/C1570/W/22/3296426) against refusal of planning permission application for 233 residential properties.

1.3 This Statement responds to comments J1-J5 provided as part of Topic J: Flooding within the Rule 6 Schedule.

Background

1.4 The appeal site is located wholly within Flood Zone 1 as shown on the Environment Agency Flood Map for Planning and Figure 5.1 within the FRA subitted with the planning application. This is the area shown to be at low risk of river flooding. The proposal did not require the application of the Sequential or Exception Tests on this basis.

1.5 Consultation undertaken with Essex County Council, in their role as the Lead Local Flood Authority (LLFA) for flooding information relevant (see Appendix E in the FRA) identified there are no records of the site being affected by flooding.

1.6 Surface water runoff generated by the proposal, accounting for the effects of climate change, would be stored on site using attenuation basins and SuDS corridors, before discharging into the existing watercourse via a Hydro-brake control chamber to the west of the site as displayed on the Drainage Strategy in Appendix G within the FRA. This formalised approach to controlling runoff to the 1 in 1 year return period greenfield runoff rate as required and accepted by the LLFA will assist in reducing downstream flood risk.

1.7 Foul drainage is proposed to connect into the existing public foul sewer on Radwinter Road, confirmed as acceptable by Anglian Water.

1.8 The assessment considered the risks of all types of flooding to the site including tidal, fluvial, surface, groundwater, sewer and artificial sources. The FRA demonstrates the proposed residential development will not increase flood risk elsewhere and would be at low risk of flooding from the sources assessed. The proposals are in accordance with the requirements of the National Planning Policy Framework (NPPF).

1.9 The proposals and the FRA were accepted as appropriate by the Environment Agency and the LLFA as the statutory consultees on flood risk and drainage as part of the planning application.

2 Rule 6 SWTC Scott Schedule Items Raised

Item J1 – Surface Water Flooding at Access and Radwinter Road

The EA Surface Water Map shows significant flooding along Radwinter Road, including at the proposed entrance. SWTC SEPC Response 1 30/9/2021 photograph confirms. This is contrary to NPPF paragraph 159 and 167e.

Item J2 – Surface Water Flooding On Site

Evidence referred to in response by SWTC within the submission includes photographs of significant risk of waterlogging and surface water flooding on site.

The submitted Constraints maps show surface water flooding down the three valleys of the main field.

The central valley contour through the site is below a spring visible on the PROW. Flooding down the valley is shown on the Constraints Map in the D&A Statement but omitted in error from the Flood Risk Assessment.

The frontage field is a water meadow.

All indicate there is a significant risk of flooding on this site which is contrary to NPPF paragraph 159.

Item J3 – Sequential Development Applies

NPPF 161 – 165 directs development in a sequential manner to locations with least risk.

Sites have been identified that do not have comparable flood risk and are therefore preferable.

Item J4 - The Proposed Use Is More Vulnerable To Flooding Than The Existing Use

NPPF Annexe 3 details that residential areas are more vulnerable than agricultural sites when it comes to flooding, NPPF11 footnote 7 therefore applies.

Item J5 - Increase In Hard Surfacing And Surface Water Run-Off

Potential increase of surface water runoff is acknowledged in principle.

SWTC SEPC noted in the responses to the application that there are inconsistencies with the basis of the calculations, including the location of the porosity testing which was not within the water meadow where the proposed SuDS is located. These issues have not been addressed.

3 Response to Items Raised Comments

Item J1 – Surface Water Flooding at Access and Radwinter Road

3.1 Paragraph 159 of the NPPF advises:

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

3.2 Paragraph 167(e) within the NPPF states:

> *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*
>
> *(e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

3.3 The appeal site is located within Flood Zone 1 on the Environment Agency Flood Map for Planning. This is the area recognised as the lowest area of flood risk. Flood Zone 1 locations are identified as being sequential preferable with the NPPF encouraging development to be directed to these areas of lowest risk.

3.4 SWTC refers to evidence of site flooding at the proposed entrance and along Radwinter Road outside the application site. The risk of surface water flooding was identified and recognised as part of production of the Flood Risk Assessment (FRA) that accompanied the planning application.

3.5 Consultation with Essex County Council (ECC) in their role as the Lead Local Flood Authority as part of production of the FRA did not identify any specific flooding history in relation to the site or surrounding area. They accepted that the proposal is suitable for its location in line with the requirements of the NPPF.

3.6 Given the Flood Zone 1 location, the Sequential Test and Exception Tests need not be applied.

3.7 Safe access, which is a requirement for pedestrians was identified to be available on the basis of the Flood Zone 1 location. The risk of surface water flooding is recognised within the FRA, with the potential shallow depths identified to pose a low hazard.

Item J2 – Surface Water Flooding On Site

3.8 Soakaway testing undertaken as part of the FRA identified the soil conditions are not suitable for the use of infiltration drainage as part of modern day requirements. On this basis if waterlogging has anecdotally been observed on the site following high risk magnitude

storm events or prolonged rainfall; then it is apparent the soil conditions present are not freely draining.

3.9 Figure 5.2 in the FRA includes for a map of the surface water flood risk applicable to the site. This shows three areas of low surface water risk.

3.10 The surface water drainage strategy will ensure runoff generated by building roofs, roads and hardstanding areas and/or those areas identified to be at low risk of flooding will be intercepted and contained as part of a formalised system. This is to prevent areas of standing water occurring prior to being released to the watercourse at a controlled rate restricted to the annual average conditions for all storm events, presenting a betterment to flow control in relation to the existing undeveloped conditions.

3.11 The LLFA as the statutory authority to comment upon surface water flood risk have accepted the proposal is appropriate on flood risk grounds.

Item J3 – Sequential Development Applies

3.12 The Environment Agency Flood Zone mapping forms the initial basis for determining suitability of development sites as part of the Sequential Test process.

3.13 The appeal site is located within Flood Zone 1 and at low risk. The NPPF advises development should be directed to these low risk locations.

Item J4 - The Proposed Use Is More Vulnerable To Flooding Than The Existing Use

3.14 Paragraph 11 within the NPPF advises:

Plans and decisions should apply a presumption in favour of sustainable development

3.15 Footnote 7 advises the policies within the NPPF relate to areas at risk of flooding.

3.16 Residential development is classified as ‘More Vulnerable’ development. This is a more vulnerable land use type than undeveloped, greenfield agricultural land.

3.17 From a flood risk perspective, the appeal site as a Flood Zone 1 location identified within the FRA to be at low risk of the forms of flooding assessed, accepted by the Environment Agency and LLFA is an appropriate location to consider development.

Item J5 - Increase In Hard Surfacing And Surface Water Run-Off

3.18 It is acknowledged that the introduction of the proposed development and associated hard standing would potentially increase surface water runoff, which in turn could increase flood risk elsewhere if this was not managed in accordance with LLFA drainage requirements and local planning policy.

3.19 The drainage strategy produced and included within the FRA proposes the inclusion of sustainable drainage basins to ensure runoff generated by the proposal will be contained and held back on site prior to being released to the watercourse present at a controlled rate. The flow rate being restricted to the annual average rain storm magnitude. This offers an improvement to the existing undeveloped nature of the site concerning the surface water runoff flow rate.

3.20 Soakaway testing was undertaken in the low topographic points of the site where infiltration drainage basins were initially being considered as part of a gravity drainage system. The results of the soakaway testing undertaken by a third party contractor identified that the use of soakaway drainage was not feasible. The position of the testing locations is not relevant to the accepted approach to discharge runoff to watercourse as soakaway drainage is not proposed.

3.21 The LLFA as the competent authority have accepted the suitability of the proposed drainage strategy and the associated storage calculations produced to support the proposed design.

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