COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: Cherwell
Application No: 20/02083/OUT-3
Proposal: Outline - Erection of 14 two-storey dwellings
Location: Land north of Hempton Road and west of Wimbourn Close, Deddington

Response date: ***14th January 2020***

This report sets out the officer views of Oxfordshire County Council (OCC) on the above proposal. These are set out by individual service area/technical discipline and include details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement. Where considered appropriate, an overarching strategic commentary is also included. If the local County Council member has provided comments on the application these are provided as a separate attachment.

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Location: Land north of Hempton Road and west of Wimbourn Close, Deddington

Drainage

Recommendation:

Objection

Key Issues:

The comments made on the previous submission has not been addressed in this submission.

Regional based control systems are unacceptable. The scheme proposed must have its own source control, limiting discharge to greenfield run-off rates.

The FRA submitted must be made relevant to the site proposed. It must not include partial sites from other applications. This site must be treated as a standalone submission, hence it should have its own drainage strategy and discharge control system on site.

Detailed comments:

The applicant must submit a standalone proposed drainage strategy in accordance with latest national and local authority guidance. There is no evidence to show the existing additional pond can take extra discharge.

Since the proposal includes car parking spaces and the proposed site partially falls within Groundwater Protection Zone, water quality standards must be met. Therefore, Proposed development needs a water quality assessment in accordance with Section 4 and Section 26 of SuDS Manual.

Proposed development must meet local standards, L19, “At least one surface feature should be deployed within the drainage system for water quality purposes, or more features for runoff which may contain higher levels of pollutants in accordance with the CIRIA SuDS Manual C753. Only if surface features are demonstrated as not viable, then approved proprietary engineered pollution control features such as vortex separators, serviceable/ replaceable filter screens, or pollution interceptors may be used”

Applicant must provide calculation files clearly indicating how a gravity system is to be delivered with greenfield discharge rates.

The LLFA feel the below figures are above green-field run-off rates for the site
1:1 flow rate 63l/s

1:30 flow rate 146l/s
1:100 flow rate 230l/s

A sustainable surface water management strategy in line with OCC Guidance, as per the below, must be submitted:

Further comments:

The Sustainable Drainage Systems (SuDS) Policy, which came into force on the 6th April 2015 requires the use of sustainable drainage systems to manage runoff on all applications relating to major development. As well as dealing with surface water runoff, they are required to provide water quality, biodiversity and amenity benefits in line with National Guidance. The Sustainable Drainage Systems (SuDS) Policy also implemented changes to the Town and Country Planning (Development Management Procedure) (England) Order 2010 to make the Lead Local Flood Authority (LLFA) a statutory Consultee for Major Applications in relation to surface water drainage. This was implemented in place of the SuDS Approval Bodies (SAB's) proposed in Schedule 3 of the Flood and Water Management Act 2010.

All full and outline planning applications for Major Development must be submitted with a Surface Water Management Strategy. A site-specific Flood Risk Assessment (FRA) is also required for developments of 1 hectare or greater in Flood Zone 1; all developments in Flood Zones 2 and 3 or in an area within Flood Zone 1 notified as having critical drainage problems; and where development or a change of use to a more vulnerable class may be subject to other sources of flooding.

Further information on flood risk in Oxfordshire, which includes access to view the existing fluvial and surface water flood maps, can be found on the Oxfordshire flood tool kit website. The site also includes specific flood risk information for developers and Planners.

The National Planning Policy Framework (NPPF), which was updated in February 2019 provides specific principles on flood risk (Section 14, from page 45). National Planning Practice Guidance (NPPG) provides further advice to ensure new development will come forward in line with the NPPF.

Paragraph 155 states; "*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."*

As stated in Paragraph 158 of the NPPF, we will expect a sequential approach to be used in areas known to be at risk now or in the future from any form of flooding.

The Non-statutory technical Standards for sustainable drainage systems were produced to provide initial principles to ensure developments provide SuDS in line with the NPPF and NPPG. Oxfordshire County Council have published the "Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire" to assist developers in the design of all surface water drainage systems,

and to support Local Planning Authorities in considering drainage proposals for new development in Oxfordshire. The guide sets out the standards that we apply in assessing all surface water drainage proposals to ensure they are in line with National legislation and guidance, as well as local requirements.

The SuDS philosophy and concepts within the Oxfordshire guidance are based upon and derived from the CIRIA SuDS Manual (C753), and we expect all development to come forward in line with these principles.

In line with the above guidance, surface water management must be considered from the beginning of the development planning process and throughout – influencing site layout and design. The proposed drainage solution should not be limited by the proposed site layout and design.

Wherever possible, runoff must be managed at source (i.e. close to where it falls) with residual flows then conveyed downstream to further storage or treatment components, where required. The proposed drainage should mimic the existing drainage regime of the site. Therefore, we will expect existing drainage features on the site to be retained and they should be utilised and enhanced wherever possible.

Although we acknowledge it will be hard to determine all the detail of source control attenuation and conveyance features at concept stage, we will expect the Surface Water Management Strategy to set parameters for each parcel/phase to ensure these are included when these parcels/phases come forward. Space must be made for shallow conveyance features throughout the site and by also retaining existing drainage features and flood flow routes, this will ensure that the existing drainage regime is maintained, and flood risk can be managed appropriately.

By the end of the Concept Stage evaluation and initial design/investigations Flows and Volumes should be known. Therefore, we ask that the following Pro-Forma is completed and returned as soon as possible:

Officer's Name: Sujeenthan Jeevarangan
Officer's Title: LLFA Planning Engineer
Date: 12 January 2021