

via e-mail

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LPA Ref: FUL/2023/0005
Date: 25 May 2023
NCC Member: Cllr Judy Oliver

LLFA Ref: FW2023_0159
Tel No.: 0344 800 8020
Email: llfa@norfolk.gov.uk

Dear Mr Zieja,

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

Creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Creation of a new access onto the A148 Holt Road with the closure of the eastern end of the existing Holt Road and reinstatement to highway verge at Land off Holt Road, Sheringham, NR26 8TW.

Thank you for your consultation on the above site, received from the Local Planning Authority (LPA) on 22 February 2023. The County Council, as Lead Local Flood Authority (LLFA), have reviewed the application as submitted.

This is a full planning application for the creation of a new recycling centre to deal with household waste and small amounts of trade waste.

This is the first formal consultation received by the LLFA in our role as a statutory consultee to the planning application process.

The applicant has provided the following information to account for flood risk and drainage aspects of the planning application:

- Document Title: Flood Risk Assessment and Surface Water Drainage Strategy | Author: Stantec UK Ltd | Ref: 332210167 | Rev: N/A | Dated: November 2022

- Document Title: Technical Note | Author: Stantec UK Ltd | Ref: TN001 | Rev: N/A | Dated: 25 April 2023
- Multiple drawings submitted as individual files to the planning portal. Some of these have been included as appendices to the above documents.

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 understanding that the document titled Technical Note is an addendum to the document titled Flood Risk Assessment and Surface Water Drainage Strategy and they are to be read together.

Following review, the LLFA have the following comments and advice:

- We welcome the concept of the drainage strategy, but have concerns with the feasibility, functioning, design and classification of SuDS features proposed.
- We have concerns with the data to inform the infiltration aspect of the drainage strategy.
- We note many cross-point issues with the submitted information.
- The information submitted is across multiple different documents/drawings (piecemeal submission) making it very difficult to review. We request that future revisions are consolidated into a single flood risk assessment and drainage strategy report.
- Comments, advice and recommendations made at this time are representative of the current submitted information for the planning application. Where applicants vary drainage proposals and/or submit further information to account for flood risk and drainage aspects of the planning application, the LLFA may amend the original comments 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.

We **object** 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 at a full planning application stage.

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.

We will consider reviewing this objection if sufficient information is submitted to address the following:

- With reference to the review and comments provided in the annex, further supporting information or revised details are submitted for:
 - Drainage Scheme, SuDS Component Elements and Four Pillars of SuDS
 - Drainage Design Calculations/Modelling
 - Drainage Strategy Drawing
 - Drainage Detail Drawings
 - Drainage Hierarchy and Viability
 - Discharge Rates, Connections and Permissions and/or Consent
 - Greenfield/Brownfield Runoff Rates (Pre- and Post-development)
 - Greenfield/Brownfield Runoff Volumes (Pre- and Post-development)
 - Water Quality
 - General Mitigation and Freeboard Allowances
 - Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage Systems

Detailed comments can be found in the attached annex.

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 re-consulted 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.

Annex: Norfolk County Council (LLFA) - Additional Information to LPA



LPA Application Ref: FUL/2023/0005	LPA: Norfolk County Council
LLFA Ref: FW2023_0159	Applicant Name: Redacted
<p>Site Name/Description: Creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Creation of a new access onto the A148 Holt Road with the closure of the eastern end of the existing Holt Road and reinstatement to highway verge at Land off Holt Road, Sheringham, NR26 8TW.</p>	Greenfield or Brownfield Development: Greenfield
Planning Stage: Full	<p>Summary of Surface Water Drainage Proposals:</p> <ul style="list-style-type: none"> • Collection via point and lateral mechanisms: <ul style="list-style-type: none"> * Rainwater downpipes → Pipes → Rain Garden → Pipes → Attenuation feature * Gullies → Pipes → Attenuation feature * Overland flow through flush kerbs → Attenuation feature • Attenuation features have been described as swales. These perimeter the site in the north and east. • Discharge is via infiltration. <p>SuDS quantity benefit: See assessment below. SuDS quality benefit: See assessment below. SuDS amenity benefit: See assessment below. SuDS biodiversity benefit: See assessment below.</p>
<p>Document Summary: Summary of documents submitted by the applicant to account for flood risk and drainage aspects of the planning application (as assessed by the LLFA).</p>	

- Document Title: Flood Risk Assessment | Author: Stantec UK Ltd | Ref: 332210167 | Rev: N/A | Dated: November 2022 (*For ease, referred to as 'Document 1' within the below review*).
- Document Title: Technical Note | Author: Stantec UK Ltd | Ref: TN001 | Rev: N/A | Dated: 25 April 2023 (*For ease, referred to as 'Document 2' within the below review*).
- Multiple drawings submitted as individual files to the planning portal. Some of these have been included as appendices to the above documents.

LLFA Flood Risk Assessment and Site Summary: Summary of both local and strategic flood risk sources, on and within the proximity of the site, with additional site specific informatives (based on datasets available to the LLFA).

Surface Water Runoff ^{[1], [2], [3], [4]}

- The site is not deemed to be at risk of flooding from surface water runoff.

Ordinary Watercourses ^{[1], [2], [3], [4], [5]}

- No ordinary watercourses are known to exist on or within proximity of the site.
- The site is not deemed to be at risk of flooding from ordinary watercourses.

Groundwater ^{[1], [3], [6]}

- Nationally available hydrogeological and groundwater datasets are projected on a wider (coarser) regional/national scale of assessment. They should only be used at this scale. Groundwater specific datasets are hazard (susceptibility) based and do not indicate risk of flooding from groundwater. These datasets state they should not be used on their own to make planning decisions at any scale, and, in particular, should not be used to inform planning decisions at the site scale. We have not included these in our assessment and have used localised data, including that submitted by the applicant, to inform our advice.
- The applicant has carried out an in-situ ground investigation. Groundwater and flood risk from groundwater has been explored within both Document 1 and Document 2.
- The in-situ ground investigation report has been submitted as Appendix A of Document 2. No form of groundwater was encountered during any of the excavations down to a depth 15.45mbgl. We note that the investigation was carried out in April 2022 (Spring) when results tend to be more representative of peak levels).
- Nearby British Geological Society borehole record (BGS Ref: TG14SE39), located east of the site, recorded resting water levels at 35.05mbgl.
- Based on the data available, flood risk from groundwater at the local site level appears to be low.

Sewers ^[7]

- There are no public sewer assets known to exist in the general area.

- We advise the local sewerage sector company are consulted for information on flood risk from sewers and any records of sewer flooding due to hydraulic incapacity of their network.
- The LLFA do not have access to private sewer datasets.

Main River ^{[1], [5]}

- There are no main rivers known to exist on or within proximity of the site.
- The site is not deemed to be at risk of flooding from main rivers.
- This is defined as strategic flood risk and we advise the Environment Agency are consulted for formal comments.

The Sea ^{[1], [5]}

- The site is not within proximity of the sea or a tidal reach.
- The site is not deemed to be at risk of flooding from the sea.
- This is defined as strategic flood risk and we advise the Environment Agency are consulted for formal comments.

Large Raised Reservoirs ^{[1], [2], [8]}

- No large raised reservoirs are known to exist on or within proximity of the site.
- The site is not deemed to be at risk of flooding from reservoirs in any scenario event.
- This is defined as strategic flood risk and we advise the Environment Agency are consulted for formal comments.

Critical Drainage Catchments (CDC) ^[3]

- The site is not in a CDC as defined by the district council and the LLFA.

Internal Drainage Board (IDB) ^{[9], [10]}

- The site is not in an IDB district for the regulation of ordinary watercourses. Any works which could affect the flow in an ordinary watercourse which is outside of an IDB district will need consent from the LLFA.

Source Protection Zones (SPZ) ^[11]

- The site is within a SPZ 3 for surface water / groundwater.

Norfolk County Council Flood Records ^[3]

- Norfolk County Council, in its role as LLFA, hold no records of internal or anecdotal (inclusive of external) flooding within an approximate 0.5km radius of the site boundary.

- Norfolk County Council flood investigation reports can be found [here](#). However, it should be noted that our records only cover the period of 2011 to the present day.

Reference No.	Data Sources in Order of Use (with available URLs)	Data Attribution Statements
[1]	Open Government Licence (nationalarchives.gov.uk)	Contains public sector information licensed under the Open Government Licence v3.0.
[2]	Ordnance Survey Vector Basemap (District and Local) Ordnance Survey MasterMap Networks – Water Layer	© Crown Copyright and Database rights 2023 Ordnance Survey 100019340
[3]	Norfolk County Council (LLFA) Data Sources Flood investigations - Norfolk County Council Norfolk County Council – Surface Water Management Plans	© Copyright Norfolk County Council 2023.
[4]	Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping 3.33% , 1.0% and 0.1% AEP events.	© Environment Agency copyright and/or database right 2015. All rights reserved. Some features of this information are based on digital spatial data licensed from the Centre for Ecology & Hydrology © NERC (CEH). Defra, Met Office and DARD Rivers Agency © Crown copyright. © Cranfield University. © James Hutton Institute. Contains OS data © Crown copyright and database right 2015. Land & Property Services © Crown copyright and database right.
[5]	EA Flood Map for Planning Flood Zone 2 and Flood Zone 3 .	© Environment Agency copyright and/or database right 2018. All rights reserved. Some features of this map are based on digital spatial data from the Centre for Ecology & Hydrology, © NERC (CEH). © Crown copyright and database rights 2018 Ordnance Survey 100024198.

[6]	Single Onshore Borehole Index (SOBI) - British Geological Survey (bgs.ac.uk) GeoIndex (onshore) - British Geological Survey (bgs.ac.uk)	Contains British Geological Survey materials © UKRI [2023].
[7]	Anglian Water Data Sources	© Copyright Anglian Water Services Limited 2022. All rights reserved.
[8]	Reservoir Flood Extents - Dry Day (National) Reservoir Flood Extents - Wet Day (National) Reservoir Flood Extents - Fluvial Contribution (National)	© Environment Agency copyright and/or database right 2021. All rights reserved.
[9]	Association of Drainage Authorities: Administrative Boundaries - Internal Drainage Districts in England	© Association of Drainage Authorities copyright and/or database right 2020. All rights reserved.
[10]	Water Management Alliance	© Water Management Alliance. Defenders of the Lowland Environment.
[11]	Source Protection Zones	© Environment Agency copyright and/or database right 2016. All rights reserved.

LLFA Assessment: Breakdown assessment of documents submitted by the applicant to account for flood risk and drainage aspects of the planning application.

An assessment against the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), SuDS Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015), both local and best practice guidance documents and the policies of the adopted Norfolk Local Flood Risk Management Strategy is as follows:

Assessment of Site and Local Flood Risk Issues

- Referred to in Section 3.0 of Document 1 and Point 1 of Document 2. Supported by an in-situ ground investigation submitted as Appendix A of Document 2.
- All sources of flood risk have been scoped. National, regional and local data has been used to inform the assessment.
- We advise sufficient information has been provided.

Sequential Test/Sequential Approach

- Referred to in Section 6.0 of Document 1.

- It is the decision of the LPA as to whether a sequential test/approach is required for the development.

Supporting Detailed Flood Modelling

- The site has no projected above ground flooding from local or strategic flood risk sources.
- The LLFA are satisfied at this time that further supporting detailed flood modelling is not applicable. A suitable drainage design should limit flood risk on-site.

Drainage Scheme, SuDS Component Elements and Four Pillars of SuDS

- Referred to in Section 7.0 of Document 1 and Point 2 of Document 2.
- The applicant is proposing collection via point and lateral mechanisms:
 - Rainwater downpipes → Pipes → Rain Garden → Pipes → Attenuation feature
 - Gullies → Pipes → Attenuation feature
 - Overland flow through flush kerbs → Attenuation feature
 - Attenuation features have been described as swales. These perimeter the site in the north and east.
 - All discharge is via infiltration
- We welcome the concept of the drainage design, using green SuDS components and predominantly lateral collection mechanisms. We advise that traditional gullies being used in the yard area of the site are due to the development type and associated contamination mitigation. Gully use in the southwest of the site has been screened, scoped and justified.
- A breakdown of the four pillars of SuDS has been included reflective of the current submitted information.
- There are currently minimal details around the rain garden on-site (see later headings).
- We query the classification of the attenuating features on-site. We do not believe these best represent swales and advise these are closer to elongated infiltration basins or infiltration ditches. Classification and design of these features has implications across the drainage strategy, for example, water quality benefits, drainage design modelling etc. We require some further clarity around these features and the reasoning behind the design.
- Cross-referencing the strategy commentary, design calculations/modelling and supporting strategy drawings, we note discrepancies in the proposals.
- We advise the information submitted so far is not to the standards expected by the LLFA.
- **We recommend further supporting information or revisions are required.**

Drainage Design Calculations/Modelling

- Referred to in Section 8.0 of Document 1 and Point 3 of Document 2. Design calculations/modelling have been submitted as Appendix B of Document 2.

- We have reviewed the design calculations/modelling in conjunction with applicable drainage strategy drawings (see next heading).
- We have reservations with the design calculations/modelling provided and require some clarifications from the engineer. As a high level overview, we note:
 - Parts of the system do not appear to have been modelled.
 - The naming convention is difficult to follow and correspond to strategy drawings.
 - Climate change allowances are missing for the 3.33% AEP event.
 - Both design input and output criteria are queried.
 - Both simulation input and output criteria are queried.
- Cross-referencing the strategy commentary, design calculations/modelling and supporting detail and strategy drawings, we note discrepancies in the proposals.
- We believe this aspect of the drainage strategy is likely to require significant revision. At this time, these are not to the standards expected by the LLFA.
- **We recommend further supporting information or revisions are required.**

Drainage Strategy Drawings

- Referred to in Point 4 of Document 2. It is our understanding that the drainage strategy is to be understood from various drawings, most of which have been included as Appendix C of Document 2. We note that this aspect of the submission is very fragmented and needs to be more clearly consolidated. We have inferred the strategy from:
 - Drawing Title: Proposed Drainage Layout | Drawn By: Stantec UK Ltd | Drawing No: 49868/2001/501 Rev: P06 | Dated: 28 April 2023
 - Drawing Title: Catchment Plan | Drawn By: Stantec UK Ltd | Drawing No: 49868/2001/503 | Rev: P03 | Dated: 28 April 2023
 - Drawing Title: Kerbing Layout | | Drawn By: Stantec UK Ltd | Drawing No: 49868/2001/1101 | Rev: P06 | Dated: 02 February 2023
 - Drawing Title: Construction Details | Drawn By: Stantec UK Ltd | Drawing No: 49868_2001_521 | Rev: P05 | Dated: 28 April 2023
 - Drawing Title: Proposed Contour Plan | Drawing No: 49868/2001/601 | Drawn By: Stantec UK Ltd | Rev: N/A | Dated: 28 April 2023
- The latter two drawings have been reviewed in detail under separate headings but used to compliment the review of the drainage layout and intended hydraulic function.
- As previously stated, we welcome the concept of the drainage design, using green SuDS components and predominant lateral collection mechanisms.
- The intended function of the drainage design is recognised.
- We advise of difficulty cross-referencing with the drainage design calculations/modelling, specifically the drainage naming conventions and missing catchment naming convention.

- Cross-referencing the strategy commentary, design calculations/modelling and supporting detail and strategy drawings, we note discrepancies in the proposals.
- We note some features are missing from the drainage strategy layout (Drawing No: 49868/2001/501 | Rev: P06 | Dated: 28 April 23).
- We advise the information submitted so far is not to the standards expected by the LLFA.
- **We recommend further supporting information or revisions are required.**

Drainage Detail Drawings

- Referred to in Point 4 and Point 5 of Document 2. Detail drawings have been submitted as Appendix C of Document 2 (Drawing No: 49868_2001_521 | Rev: P05 | Dated: 28 April 2023).
- There is no drawing for the spent fire water storage tank.
- There is no drawing for the proposed rain garden in the west of the site.
- With reference to previous points, the drawings of the attenuation features have do not reflect what has been modelled in InfoDrainage or what is being proposed in the strategy commentary.
- Some features detailed are not identifiable on the drainage strategy layout (Drawing No: 49868/2001/501 | Rev: P06 | Dated: 28 April 23).
- With reference to previous points around classification of the features, we question whether the attenuation features have been designed in accordance with best practice. The drawings do not reflect best practice design for features classified as swales. Examples include:
 - The sides of the features 1:2.5 gradient making them too steep.
 - Channel base width.
 - The 900mm depth in the eastern attenuation feature far exceeding the 400-600mm recommended.
 - Freeboard in the features.
- We advise the information submitted so far is not to the standards expected by the LLFA.
- **We recommend further supporting information or revisions are required.**

Drainage Features - Protection from all Sources of Flooding

- Referred to in Point 6 of Document 2.
- The site does not appear to be at risk of flooding from any source. Protection of the drainage system from flood risk sources has not been deemed necessary for current proposals. If revisions are made, this may need to be reviewed.
- We advise sufficient information has been provided at this time.

Drainage Hierarchy and Viability

- Referred to in Section 1.0 of Document 1 and Point 7 of Document 2.
- Rainwater re-use and harvesting has been scoped out due to economic reasons. Infiltration has been deemed a viable option for discharge of surface water for the whole site. This has been informed by an in-situ ground investigation report submitted as Appendix A of Document 2.
- Groundwater levels at the site indicate that a 1.20m unsaturated zone would be present under any shallow infiltrating drainage features (invert at 2.00mbgl or less). However, we advise the following:
 - Infiltration testing has been conducted at 2.90mbgl and 3.00mbgl. This is not reflective of shallow infiltration (invert at 2.00mbgl or less) and is not reflective of the invert depth of any of the infiltrating features proposed on site.
 - Infiltration testing has only been done in the east of the site at the location of the eastern attenuation feature. Other infiltrating features have not had in-situ infiltration testing carried out.
 - Issues with testing aside, the output infiltration rates have not been applied into the drainage design modelling in accordance with best practice standards.
- We advise the information submitted so far is not to the standards expected by the LLFA.
- **We recommend further supporting information or revisions are required.**

Discharge Rates, Connections and Permissions and/or Consent

- See comments under the previous heading. Once we are satisfied that the drainage hierarchy and viability has been suitably followed/applied, we will provide comments.
- **We recommend further supporting information or revisions are required.**

Greenfield/Brownfield Runoff Rates (Pre- and Post-development)

- Referred to in Point 8 of Document 2. Supported by calculations submitted as Appendix E of Document 2.
- Greenfield rates have been provided for respective AEP events. A QBAR rate has also been provided.
- We are unsure how the site area figure of 0.4ha has been calculated. The total site area is understood to be 0.59220ha, the contributing area is understood to be 0.32305ha. Some clarity around this would be welcomed.
- A relevant comparison between pre- and post-development runoff volumes has not been made within Document 1 or Document 2.
- Even if a site is proposing to discharge via infiltration, we would still expect to see these calculated and discussed as a comparative between pre- and post-development in line with statutory and non-statutory standards to demonstrate due diligence in the design.
- **We recommend further supporting information or revisions are required.**

Greenfield/Brownfield Runoff Volumes (Pre- and Post-development)

- No references or relevant comparison have been made to pre- and post-development runoff volumes within Document 1 or Document 2.
- Even if a site is proposing to discharge via infiltration, we would still expect to see these calculated and discussed as a comparative between pre- and post-development in line with statutory and non-statutory standards to demonstrate due diligence in the design.
- **We recommend further supporting information or revisions are required.**

Urban Creep

- Urban creep is not applicable to this type of development.

Water Quality

- Referred to in Section 7.0 of Document 1 and Points 2 and 9 of Document 2. Supported by an Environment Agency email submitted as Appendix D of Document 2.
- The Environment Agency have confirmed the Simple Index Approach is an appropriate tool for assessing water quality for the development type.
- The site will benefit from on-going water quality testing in the eastern attenuation storage feature through two sampling points.
- We do not believe that the Simple Index Approach has been applied correctly to the development. We are concerned with the indices being used for the named 'Bioretention Swale'. These indices do not best reflect what is being proposed for construction on-site.
- We re-emphasise the design of these features and classification are also being questioned, both being highly influential factors when water quality is considered and will likely involve alterations to the current submission.
- **We recommend further supporting information or revisions are required.**

Phasing Issues and Mitigation

- Referred to in Point 10 of Document 2.
- The development is intended to be built as a single phase. If revisions are made, this may need to be reviewed.
- We advise sufficient information has been provided at this time.

General Mitigation and Freeboard Allowances

- No references have been made to general mitigation within Document 1 or Document 2.
- Finished floor levels have been referred to in Point 5 of Document 2. A 150mm freeboard from finished surface level to finished floor level has been confirmed.

- We have reservations about the 300mm freeboard quoted. The evidence submitted is only for the northern attenuation structure. The 300mm freeboard should be demonstrated for site flood levels (if applicable) or the peak water level across the entire drainage network. This includes the conveyance network.
- Where drainage design calculations/modelling are also being objected to and are likely to change, we cannot guarantee that the freeboards will be maintained moving forward.
- **We recommend further supporting information or revisions are required.**

Exceedance Routes (Flood event greater than 1.0% AEP +CC event)

- A minor reference has been made within Section 8.0 of Document 1.
- The drawing titled Proposed Contour Plan (Drawing No: 49868/2001/601 | Rev: N/A | Dated: 28 April 2023) has been submitted as part of Appendix C of Document 2. It is understood that both flow direction and exceedance routes are indicated on the drawing based on the current proposals. If revisions are made, this may need to be reviewed.
- We advise sufficient information has been provided at this time.

Maintenance and Management

- Referred to in Section 7.0 of Document 1 and Point 11 of Document 2.
- Though we do see maintenance and management proposals as more comprehensive, detailed separate reports, we are satisfied that the fundamentals of expected maintenance at the site have been considered and a foundation to build on has been established.
- We welcome that a management company has been stated.
- We note that this has been based on current proposals. If revisions are made, this may need to be reviewed.
- We advise sufficient information has been provided at this time.

Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage Systems

- Referred to in Point 12 of Document 2.
- We do not believe this is a full summary of all applicable non-statutory standards to the site, nor does the current information provided summarise the proposals respective of these standards.
- **We recommend further supporting information or revisions are required.**