

LLFA PLANNING RESPONSE

Objection 1 – Surface Water Sustainable Drainage Strategy

The LLFA has queried whether the proposed drainage strategy shows that post-development peak flow rates will not exceed pre-development rates for the 1 in 1-year and 1 in 100-year events.

We have modelled existing and proposed surface-water flows using InfoDrainage for the 1:1, 1:30 and 1:100-year rainfall events, in line with Point 1 of Section 24.5 of the SuDS Manual (C753). The results show:

- 1 in 1-year event: pre-development 18.9 l/s; post-development 4.9 l/s (around 75 % reduction).
- 1 in 100-year event: pre-development 56.5 l/s; post-development 22.5 l/s (around 60 % reduction).

These figures include both central and upper-end climate-change allowances (see table below). They demonstrate that peak discharges after development are substantially lower than existing flows and therefore satisfy Defra Technical Standards S2 and S3 as well as NPPF paragraph 169.

	Pre-development pipe 1.001	Post-development pipe 1.003	Post-development with CC Central allowance	Post-development with CC Upper end allowance
Max flow rate 1:1 year	19.1	4.9	4.9	4.9
Max flow rate 1:100 year	56.5	19	22.5	22.5
1:100 360min Discharge Volume	107.91	108.32	146.35	162.65
Increase in discharge l/s	NA	0	1.75	2.52

Objection 2 – Minimum Operational Standards for Volume Control

The LLFA has also asked for more evidence that runoff volumes for a 1 in 100-year, 6-hour event have been limited to a level reasonably close to greenfield and do not exceed pre-development discharge volumes.

The current site is 100 % hardstanding. The proposed development will be about 70 % roof and the remainder hardstanding. The table above shows the pre- and post-development discharge volumes for a 1 in 100-year, 6-hour event:

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- Without climate-change allowance, pre- and post-development discharge volumes are broadly similar.
- With the central allowance, the additional volume is 38.03 m³, which over 6 hours equates to 1.75 l/s—below the widely used greenfield limit of 2.0 l/s (UKSuDS and Rainfall Runoff Management for Developments guidance).
- With the upper-end allowance, the additional volume is 54.33 m³, equating to 2.52 l/s compared to pre-development.

The extra volume will be contained within a 44 m³ cellular attenuation tank. Existing runoff is simulated at 29.5 l/s; applying a 30 % betterment gives a restricted flow of 20.65 l/s through a hydrobrake. While full compliance with Defra Standard S5 cannot be achieved under climate-change allowances, the strategy meets Standard S6: central-allowance discharges are below 2.0 l/s and upper-end allowances only slightly exceed this limit. On this basis, the development is not expected to increase downstream flood risk.

Objection 3 – Multifunctional Surface Water SuDS

The LLFA has asked for evidence that the drainage system offers wider benefits such as improved water quality, biodiversity and amenity (NPPF paragraphs 181 and 182).

The site is a brownfield plot within a larger industrial estate. The proposed building footprint, hardstanding for vehicles and plant, and health and safety requirements leave little space for open SuDS features like swales, filter strips or rain gardens. Rainwater harvesting is also not appropriate for this low-occupancy industrial use.

However, the scheme does deliver an improvement in water quality. A greater proportion of the site will be roofed rather than used for parking, reducing the risk of pollutants in runoff. In addition, all runoff will pass through a flow-control device and attenuation storage before discharge, which allows settlement of solids.

While multifunctional SuDS features are not feasible here, the drainage arrangements improve on the existing situation and address the intent of NPPF paragraphs 181 and 182.

Summary

- The drainage design has been modelled using InfoDrainage in line with SuDS Manual (C753) Section 24.5.
- Peak discharges for 1 in 1 and 1 in 100-year events are reduced by approximately 75 % and 60 % respectively, meeting S2 and S3.
- Volume control meets S6, with discharges below or close to 2.0 l/s under climate-change scenarios and 44 m³ of attenuation.
- Water quality improves due to reduced traffic areas and flow control.

Accordingly, the proposals accord with Defra Technical Standards S2, S3, S5/S6 and NPPF paragraphs 169, 181 and 182.