

RSK ref: 680119-01L LLFA-01
Planning ref: S62A/22/000002UTT/22/1040/PINS
Essex County Council ref: SUDS-005957

15th June 2022

FAO : Mr Mark Bolton
The Planning Inspectorate

By email only

**Consultation Response – S62A/22/000002: Former Friends School Mount Pleasant Road, Saffron Walden, Essex, CB11 4AL
Response to Essex County Council (ECC) as the Lead Local Flood Authority (LLFA) Holding Objection**

In response to comments received from ECC with respect to the indicative drainage proposals at the above site, we write to provide additional information to address the issues raised in ECC's letter dated 4th May 2022 (see **Appendix A**).

This response makes reference to the previously submitted Flood Risk Assessment produced by RSK Group ref. 680119-R1(2). For ease of reference, we have copied the pertinent points from the ECC holding objection in blue text with a direct RSK response to each point following on in black text.

At the outset, we must stress that according to national planning policy, this brownfield site is located in Flood Zone 1, and, as concluded in the FRA, is assessed as being at either low, or very low risk of flooding from all sources, and therefore is considered appropriate development. This is a key point that we feel has been largely overlooked in the ECC response, which reads as quite negative, and we feel this overarching point should be given significant weighting in the planning balance and decision making process.

Furthermore, when considered in the context of the sites existing function and layout, the FRA demonstrates that significant betterment is achieved in terms of the proposed site surface water drainage strategy, again, something that appears to have been overlooked in the ECC response, which looks at many points which are either not relevant to the proposed development, or could be reasonably dealt with by way of planning condition.

Taking the holding objection points in turn:-

- **ECC Point 1.**

Surface water should be managed by following the SuDS drainage hierarchy as indicated in SuDS Design Guide. The plan does not demonstrate that water re-use has been considered or why it may have been disregarded.

Water re-use (although encouraged) is not required by policy, particularly for constrained sites such as this that re-utilise large sections of existing buildings. The FRA did not consider this as even if water re-use did



form part of the scheme, any components (such as rainwater harvesting tanks and green roofs) would need to be assumed as being full with respect to the overall surface water drainage strategy.

We acknowledge that the Essex SuDS guide states “Where there is pressure on water resources, rainwater re-use systems should form part of the surface water management strategy for the site.” Affinity Water as the local potable water supplier has confirmed that there are no water supply issues in this area (See letter in **Appendix B**).

- ECC Point 2.

The drainage scheme has potential to incorporate source control features such as green roofs and rain gardens to fully comply with SuDS design Criteria. This does not appear to have been considered.

In addition to the points stated above in response to Point 1, it was not considered feasible to incorporate green roofs or rain gardens due to the required design of the new build elements and the structural and engineering constraints related to the retained building.

The site benefits from the ability to drain via soakaways into the natural chalk. Surface water will be filtered using filter drains and soakaways before draining into the ground. Green roofs pose a maintenance and fire hazard to buildings and we would not propose to install these features on a scheme of this nature. Rain gardens are not part of the scheme due to the lack of appropriate spaces within the proposed site external layout.

- ECC Point 3.

The drainage plan does not evidence how the runoff from the roofs will connect to the drainage system or how they will receive treatment.

The FRA states that following a detailed survey of the existing roof area, the catchments and contributing impermeable areas may need to be refined. It was assumed that the roof drainage was to connect into the drainage system as per the existing scenario, although this should be investigated further through structural, CCTV and engineering surveys where appropriate.

The only treatment that was specified in the drainage strategy was the soakaway features and potentially proprietary treatment systems, this is considered appropriate due to the low potential for pollution to be generated from roof drainage.

Notwithstanding the above, the applicant have agreed to reconsider the use of some permeable paving (where space and ground conditions allow) to further enhance the proposed surface water drainage strategy, we suggest that this be secured by way of a suitably worded planning condition.

- ECC Point 4.

Areas of hardstanding should be minimised, parking areas should be permeable or it should be evidenced as to why it is not appropriate.

The areas of hardstanding have been minimised, and the overall effect of the redevelopment reduces the percentage of the site covered by hardstanding by 8% (c. 0.27ha), therefore even before you consider the effect of the proposed new soakaways, there is considerable betterment offered by the scheme.

The soakaways have been designed to the appropriate standard and accommodate the 100 year storm with an appropriate allowance for climate change.

As previously stated in response to Point 4, the applicant have agreed to reconsider the use of some permeable paving (where space and ground conditions allow) to further enhance the proposed surface water drainage strategy, we would ask that this be secured by way of a suitably worded planning condition.

- ECC Point 5.

A 10% allowance for urban creep (for house roof area) should be included within the storage calculations



10% Urban creep was not applied, as the majority of the new build element of the site will be apartments with external areas not subject to change. It would be possible to revise the drainage strategy with urban creep applied to only the new build houses, but this would only add c. 200m² to the contributing impermeable area used in the calculations, and is therefore considered negligible.

If considered necessary, it is considered appropriate to cover this point by way of a suitably worded planning condition relating to urban creep for the new build elements where there could be some increase in hardcover during the lifetime of the development, although it must be re-iterated that 76 of the 96 units are flats, and therefore not subject to external alterations and potential urban creep.

- ECC Point 6.

Engineering drawings should be provided detailing the SuDS components used within the drainage system

Whilst this is a detailed planning application, because of the retained building and overall betterment provided by the reduction in impermeable area, it is considered appropriate to cover the design detail by way of a suitably worded planning condition relating to surface water drainage. This drainage design will need to draw on the principles as set out by the indicative drainage strategy set out in the FRA, which will ensure that post-development, overall flood risk will be significantly reduced when compared to the existing site configuration.

- ECC Point 6.

Exceedance flows should be considered to ensure potential off-site flooding is managed

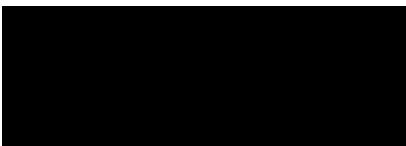
An exceedance flow plan can be produced, but as this is essentially a contour plan showing where overland flows would run in the event that the drainage system was overwhelmed or failed, this would usually be part of the detailed engineering drawings produced for the construction phase. With this in mind we suggest a condition to cover off this point.

We trust that the above meets with your approval, but should you have any further queries, please do not hesitate to contact the writers. If you deem it helpful, we would be happy to meet you on site to talk through the proposal.

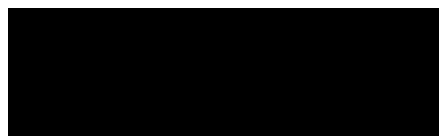
Yours sincerely,

For RSK LDE Limited

and for Chase New Homes Ltd



Matthew Cheeseman
Associate Director



James Crawl
Technical Director

Appendices

Appendix A – LLFA Holding Objection Ref: SUDS-005957 dated 4th May 2022

Appendix B – Affinity Water email correspondence

Essex County Council
**Development and Flood Risk
Environment and Climate Action,**
C426 County Hall
Chelmsford
Essex CM1 1QH



Mark Boulton
The Planning Inspectorate

Date: 4 May 2022
Our Ref: SUDS-005957
Your Ref: S62A/22/0000002
UTT/22/1040/PINS

Dear Mr Boulton,

**Consultation Response – S62A/22/0000002- Former Friends School Mount
Pleasant Road Saffron Walden Essex CB11 4AL**

Thank you for your email received on 27 April 2022 which provides this Council with the opportunity to assess and advise on the proposed surface water drainage strategy for the above mentioned planning application.

As the Lead Local Flood Authority (LLFA) this Council provides advice on SuDS schemes for major developments. We have been statutory consultee on surface water since the 15th April 2015.

In providing advice this Council looks to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems
- Essex County Council's (ECC's) adopted Sustainable Drainage Systems Design Guide
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites.

Lead Local Flood Authority position

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to issue a **holding objection** to the granting of planning permission based on the following:

- Surface water should be managed by following the SuDS drainage hierarchy as indicated in SuDS Design Guide. The plan does not demonstrate that water re-use has been considered or why it may have been disregarded.
- The drainage scheme has potential to incorporate source control features such as Green roofs and rain gardens to fully comply with SuDS design Criteria. This does not appear to have been considered.
- The drainage plan does not evidence how the runoff from the roofs will connect to the drainage system or how they will receive treatment.

- Areas of hardstanding should be minimised, parking areas should be permeable or it should be evidenced as to why it is not appropriate.
- A 10% allowance for urban creep (for house roof area) should be included within the storage calculations
- Engineering drawings should be provided detailing the SuDS components used within the drainage system
- Exceedance flows should be considered to ensure potential off-site flooding is managed

We also have the following advisory comments:

- We strongly recommend looking at the Essex Green Infrastructure Strategy to ensure that the proposals are implementing multifunctional green/blue features effectively. The link can be found below.
<https://www.essex.gov.uk/protecting-environment>
- Please note that the NPPF now states that the aim of sequential testing is to steer new development areas with the lowest risk of flooding from any source

In the event that more information was supplied by the applicants then the County Council may be in a position to withdraw its objection to the proposal once it has considered the additional clarification/details that are required.

Any questions raised within this response should be directed to the applicant and the response should be provided to the LLFA for further consideration. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Summary of Flood Risk Responsibilities for your Council

We have not considered the following issues as part of this planning application as they are not within our direct remit; nevertheless these are all very important considerations for managing flood risk for this development, and determining the safety and acceptability of the proposal. Prior to deciding this application you should give due consideration to the issue(s) below. It may be that you need to consult relevant experts outside your planning team.

- Sequential Test in relation to fluvial flood risk;
- Safety of people (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements);
- Safety of the building;
- Flood recovery measures (including flood proofing and other building level resistance and resilience measures);
- Sustainability of the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Please see Appendix 1 at the end of this letter with more information on the flood risk responsibilities for your council.

INFORMATIVES:

- Essex County Council has a duty to maintain a register and record of assets which have a significant impact on the risk of flooding. In order to capture proposed SuDS which may form part of the future register, a copy of the SuDS assets in a GIS layer should be sent to suds@essex.gov.uk.
- Any drainage features proposed for adoption by Essex County Council should be consulted on with the relevant Highways Development Management Office.
- Changes to existing water courses may require separate consent under the Land Drainage Act before works take place. More information about consenting can be found in the attached standing advice note.
- It is the applicant's responsibility to check that they are complying with common law if the drainage scheme proposes to discharge into an off-site ditch/pipe. The applicant should seek consent where appropriate from other downstream riparian landowners.
- The Ministerial Statement made on 18th December 2014 (ref. HCWS161) states that the final decision regarding the viability and reasonableness of maintenance requirements lies with the LPA. It is not within the scope of the LLFA to comment on the overall viability of a scheme as the decision is based on a range of issues which are outside of this authority's area of expertise.
- We will advise on the acceptability of surface water and the information submitted on all planning applications submitted after the 15th of April 2015 based on the key documents listed within this letter. This includes applications which have been previously submitted as part of an earlier stage of the planning process and granted planning permission based on historic requirements. The Local Planning Authority should use the information submitted within this response in conjunction with any other relevant information submitted as part of this application or as part of preceding applications to make a balanced decision based on the available information.

Yours sincerely,

Alison Vaughan, Development and Flood Risk Officer

Team: Green Infrastructure and Sustainable Drainage

Service: Climate Action and Mitigation

Essex County Council

Internet: www.essex.gov.uk

Email: suds@essex.gov.uk

Appendix 1 - Flood Risk responsibilities for your Council

The following paragraphs provide guidance to assist you in determining matters which are your responsibility to consider.

- Safety of People (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements)

You need to be satisfied that the proposed procedures will ensure the safety of future occupants of the development. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs formally consider the emergency planning and rescue implications of new development in making their decisions.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals as we do not carry out these roles during a flood.

- Flood recovery measures (including flood proofing and other building level resistance and resilience measures)

We recommend that consideration is given to the use of flood proofing measures to reduce the impact of flooding when it occurs. Both flood resilience and resistance measures can be used for flood proofing.

Flood resilient buildings are designed to reduce the consequences of flooding and speed up recovery from the effects of flooding; flood resistant construction can help prevent or minimise the amount of water entering a building. The National Planning Policy Framework confirms that resilient construction is favoured as it can be achieved more consistently and is less likely to encourage occupants to remain in buildings that could be at risk of rapid inundation.

Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels. Consultation with your building control department is recommended when determining if flood proofing measures are effective.

Further information can be found in the Department for Communities and Local Government publications '[Preparing for Floods](#)' and '[Improving the flood performance of new buildings](#)'.

- Sustainability of the development

The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF recognises the key role that the planning system plays in helping to mitigate and adapt to the impacts of climate change, taking full account of flood risk and coastal change; this includes minimising vulnerability and providing resilience to these impacts. In making your decision on this planning application we advise you consider the sustainability of the development over its lifetime.

Matthew Cheeseman

From: Steve Hall [REDACTED] >
Sent: 30 May 2022 16:14
To: James Cawt; Alan Ward
Subject: FW: Potable water resources - Saffron Walden.

James/Alan,

Please find below confirmation correspondence from Affinity Water as incumbent for the supply of mains water to the Saffron Walden area that they have no known difficulties with regards to supplying mains water. It is taken that there is therefore no "pressure on water resources" and no requirement for rainwater harvesting.

Steve Hall
Engineering and Services Manager

[REDACTED]

[REDACTED]



The Excitement is Building

Chase New Homes Limited Jasmine House 8 Parkway Welwyn Garden City Hertfordshire AL8 6HG



Please consider the environment before printing this email.

From: CallCentre [REDACTED] >
Sent: 30 May 2022 12:45
To: Steve Hall [REDACTED]
Subject: RE: Potable water resources - Saffron Walden.

Phishing Protection

Warning: Sender [REDACTED] not yet trusted by your organization.
Please be careful before replying or clicking on the URLs.

[Report As Dangerous](#) [Mark As Safe](#)

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Good afternoon

Thank you for your e-mail.

I would like to advise you I have spoken to the Regional Operations Manager today who looks after this area and has advised there are no known difficulties supply mains water to this area.

Kind regards

Joanne Pigdon
Customer Service Advisor

[REDACTED]

Affinity Water Limited
Tamblin Way, Hatfield, Hertfordshire AL10 9EZ
Email: [REDACTED]



From: Steve Hall [REDACTED]
Sent: 24 May 2022 14:58
To: CallCentre [REDACTED]
Subject: RE: Potable water resources - Saffron Walden.

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Joanne,

Your reference: Q169823 Event no 17426

Thank you for your detailed and considered response. However, our enquiry was as to whether Affinity Water have issues with regards to meeting the demand for water (rather than providing adequate flow and pressure) within your region generally and more specifically in the Saffron Walden area.

The phrase “pressure on water resources” being taken from the Essex County Council Sustainable Drainage Systems Design Guide.

If your offices could confirm that they do not have difficulties with supplying the Saffron Walden area with mains drinking water this would be helpful.

Thanks in advance for your reply by return.

Steve Hall
Engineering and Services Manager

[REDACTED]

[REDACTED]



The Excitement is Building

Chase New Homes Limited Jasmine House 8 Parkway Welwyn Garden City Hertfordshire AL8 6HG

 Please consider the environment before printing this email.

From: CallCentre [REDACTED]
Sent: 24 May 2022 14:06
To: Steve Hall [REDACTED]
Subject: RE: Potable water resources - Saffron Walden.

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Good afternoon

Q169823 Event no 17426

Thank you for your e-mail.

I would like to advise you regarding the pressure we supply on our network we do have a process

Affinity Water is only responsible for the flow and pressure to the boundary of customers properties, the flow rate should be a minimum of 9 litres per minute here. The legal requirement of pressure we are obliged to supply with here is 0.7 bar, however most of our properties have in the region of 2.5 bar. To test the pressure you have coming into the property from the main you can fill a gallon container from the cold kitchen tap and time it. If this fills in 30 seconds you have 1.5 bar, 20 seconds and you have 2 ¼ bar, any quicker and the bar will be higher.

If your pressure is below 1 bar or too low for your requirements, we would be happy to attend to investigate, but this would need to be via an appointment. The Technician would carry out a pressure and flow test at this time, there is no charge for this. We would require access to your internal stop tap which must be in good working order, this is necessary to be able to carry out the relevant checks.

Our appointment times are mornings between the hours of 8am and 12pm and afternoons 12pm and 4pm. If you wish to book an appointment, please can you provide me with your telephone number so I can contact you and book this.

I hope this information is useful to you. Please do not hesitate to contact us again if you wish to discuss further.

Kind regards

Joanne Pigdon
Customer Service Advisor



Affinity Water Limited
Tamblin Way, Hatfield, Hertfordshire AL10 9EZ

[REDACTED]



From: Steve Hall [REDACTED]
Sent: 20 May 2022 13:47
To: WOSD (for retailers only) [REDACTED]
Subject: Potable water resources - Saffron Walden.

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Operations,

As the incumbent water company operating in Essex (and elsewhere), we have enquired of your Developer Services colleagues if there is pressure on potable water resources within your region generally and more specifically in the Saffron Walden area.

Your colleagues have responded that the enquiry is to be addressed to the Operations Team, hence this e-mail.

Should the e-mail address to which this communication has been sent be in appropriate kindly forward our e-mail to an appropriate address from which an answer to our enquiry can be given.

Thank you in advance for your considered response.

Steve Hall
Engineering and Services Manager

[REDACTED]

[REDACTED]



The Excitement is Building

Chase New Homes Limited Jasmine House 8 Parkway Welwyn Garden City Hertfordshire AL8 6HG



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