

Thank you for consulting the Lead Local Flood Authority (LLFA) on the S62A/2026/0157 application for the extension to existing workshop, and construction of 2 new Class E(g) buildings, including associated infrastructure, parking and landscaping. These comments represent those of Worcestershire County Council as the Lead Local Flood Authority (as determined by the Flood and Water Management Act 2010) and are officer comments only. As the comments are made on behalf of the Worcestershire County Council we can only comment on drainage, and matters such as flood risk are not within our scope of assessment. The following comments relate to the submitted documents:

- E03A_EXISTING_SITE_PLAN_TOPO_Redacted
- P20C_PARTIAL_PROPOSED_SITE_PLAN_Redacted
- Pencroft_Planning_and_Design_Statement_Addendum__1__
- Pencroft_Planning_and_Design_Statement_Final_v2.1

Comments

I have reviewed the submitted documents and have the following comments:

Site Context

The proposed development consists of the erection of 2 new Class E(g) buildings, and the extension to an existing workshop, that forms part of the wider Laugharne Villa/Pencroft Earth Moving landholding. The development is expected to cover 1.4ha of currently undeveloped land. As required under Annex C of the August 2026 update to the National Planning Policy Framework, the applicant will need to submit a statement outlining how the national SuDS standards have been achieved.

Drainage Strategy

The applicant intends to discharge via infiltration, in line with Standard 1.2 of the National SuDS Standards, stating that tests will be done at a later stage. While I am very happy to see that the applicant is proposing infiltration, Soilscales data indicates that the site has slightly impeded drainage, and currently no geo-technical investigations have been carried out for the site. Without the results of these tests, it cannot be known if the proposed drainage strategy will work for the duration of the developments lifetime, as having low-infiltrating soil means that water will soak into the ground at a slower rate, thereby increasing the risk of flooding. It is important that we determine this at the earlier stages of the application, as the alternative drainage strategies may materially affect the layout of the site. Soilscales does indicate areas of freely draining soil west of the site, so there is a possibility that on-site testing would yield acceptable infiltration rates, however the existing conditions on site would need to be confirmed via on-site testing in line with BRE365 standards, as required by Standard 3.14 in the National SuDS Standards.

If infiltration is found to be viable on site, then we will be happy to go ahead with the infiltration strategy, so long as the test results are submitted showing the findings. In the event that soakaways are found to be unviable as a drainage destination for this development, then the applicant will need to suggest an alternative solution. There is a watercourse south-east of the site which could work, however it is unfortunately not located within the applicants boundary. If the applicant does ever seek to utilise this drainage destination, we will require them to submit written evidence of permission from the riparian owner for the connection to be made. Furthermore, if a non-infiltration method is to be used on site, then evidence of compliance with Standard 2 of the National Standards will be required, showing that at least the first 5mm of rainfall will be captured and retained on site.

SuDS Design

The applicant indicates in Table 4.2 of the Planning & Design document that the SuDS strategy will consist of permeable surfaces for source control and soakaways/infiltration trenches for attenuation/treatment. The LLFA appreciates the inclusion of multiple SuDS types, with the source control meeting requirements set out in Section 7.3 of the South Worcestershire SuDS Design & Evaluation Guide.

Currently, the application does not include any drawings for the surface water drainage system layout. As this is a full application, the general layout of the SuDS will need to be provided, showing the intended route for pipework before discharging via the proposed method, such as soakaways. Detailed design drawings with cross-sectional diagrams showing that the SuDS have been designed to be functional and safe will be needed at the discharge of conditions stage. Please also show how the SuDS system will be designed to provide biodiversity and amenity value, which will help the site in being compliant with Standards 5 and 6.

Water Treatment

Standard 4 of the National Standards requires that new developments use a SuDS approach to manage the quality of the surface water runoff generated on site. Due to the industrial nature of the site, we recommend that a pollution hazard index of “Medium” or “High” should be used for the site. The applicant will need to provide the results of simple index water treatment calculations showing how the proposed SuDS management train will treat the site’s pollution. Information on how to achieve this is provided in Chapter 26 of the CIRIA SuDS Manual. The SuDS proposed for the site would likely meet these targets, however we ask that only SuDS that the vast majority of surface water runoff will pass through should be included in the calculations.

Calculations

As the site is proposing to discharge via infiltration, a greenfield runoff rate has not been provided for this application. If infiltration is found to be unviable for this site, then

all surface water discharges must be limited to the calculated greenfield runoff rate. Furthermore, calculations to find the required attenuation for the drained parts of the site have not been included in this application. Please may we ask that the applicant provides these calculations, ensuring that all positively draining areas, including permeable spaces, are included in the total contributing area.

Storm Network calculations for the 1 year, 30 year and 100 year + 40% climate change rainfall events will also need to be provided. These calculations should show that no exceedance flooding will occur up to the 1 in 30 event, and that any exceedance flows up to the 100 year event can be safely managed. This can be conditioned.

Construction

To show compliance with Standard 7 of the National Standards, I believe that this application would benefit from the inclusion of a Construction Surface Water Management Plan, created in line with Guidance from Chapter 31.3 of the CIRIA SuDS Manual. The plan should detail the nature of the works to be completed, full site plans and scheme drawings, a timeline of construction, and the measures that will be taken to control pollutants created during the works, such as silts, metals and hydrocarbons. This can be conditioned.

Maintenance

Maintenance details for the surface water drainage system and SuDS components have not yet been provided for this development. At the discharge of conditions stage, a full maintenance strategy including a maintenance schedule, and details on who will be responsible for upholding the maintenance will be required. This can also be conditioned.

Conclusion

While the LLFA is appreciative of the applicant's use of infiltration as a surface water drainage destination, without the BRE365 test results it is not possible to know if the proposed drainage strategy will work. With the on-site infiltration test results, it will be possible to establish what surface water drainage strategy can work for the site, and how that strategy will work with the layout of the proposed development. The LLFA asks for a deferral on this application until this information can be provided, so that we can determine the best way forward for this site's drainage strategy.

██████████ 05/10/2026

For the Lead Local Flood Authority