

Appendix A to the Suffolk Flood Risk Management Strategy Outline Planning Applications Interim Guidance

Background

Recent engagement between the developers, Local Planning Authorities and Suffolk County Council as Lead Local Flood Authority (LLFA) has identified the need for additional guidance and clarification in relation to outline applications. The issue is that approval of indicative dwelling numbers at outline stage can conflict with the space required to deliver Sustainable Drainage Systems (SuDS) compliant with National & Local Policy. This has led to applicants having to undertake additional work on sites that have already been granted outline planning approval, leading to delays and additional expense.

Purpose of Interim Guidance

This interim LLFA guidance is in addition to the Suffolk Flood Risk Management Strategy (SFRMS) Appendices, and aims to clarify requirements, particularly in relation to current and future Outline applications. This guidance will be incorporated into Appendix A of the SFRMS at the next update.

The guidance aims to:

1. Ensure all the appropriate information is available to consider the effectiveness of SuDS on each site, the objective being to deliver a full above ground SuDS where achievable and appropriate
2. When full above ground SuDS are not appropriate due to site characteristics (topography, geology, existing land use/flood risk etc.), information is available to guide the design to maximize the use of above ground SuDS, with appropriate justification for any reduction. Sites with good infiltration can look to utilize below ground SuDS, but should deliver multifunctional benefits
3. Ensure evidence is provided to the Local Planning Authority, which will allow appropriate consideration of the ability of the site to balance housing numbers and an effective, compliant SuDS system.

The interim guidance is in two parts in order to take account of proposals that are currently under development, and therefore the requirements are set out in two tables one for applications submitted prior to 31st December 2020 and another for those submitted after 31st December 2020. This will allow promoters and developers sufficient time to evaluate future sites to ensure there is sufficient space allocated (approximately 12-15% of a site) for above ground, open SuDs, unless there is clear evidence this would not be inappropriate.

Whilst this cut-off date has been provided, we strongly encourage developers and their consultants to adopt this new guidance at the earliest possible opportunity to reduce the risk of any delayed submissions missing the cut-off date.

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National Legislation/Codes

- National Planning Policy Framework
- Defra's Non-Statutory Technical Standards for SuDS
- Building Regulations: Approved Document H - Drainage and Waste Disposal (2015 edition)
- BS8582:2013 Code of Practice for Surface Water Management for Development Sites
- National Design Guide, Planning Practise Guidance for beautiful, enduring and successful places

Local Policy

- Suffolk Flood Risk Management Strategy and Appendices
- Forest Heath District Council (Policy DM6 Flooding and Sustainable Drainage)
- St Edmundsbury Borough Council (Policy DM6 Flooding and Sustainable Drainage)
- Mid Suffolk District Council (Policy CS 4 Adapting to Climate Change)
- Ipswich Borough Council (Core Strategy and Policies Development Plan Document, Ipswich Drainage and Flood Defence Policy, Development and Flood Risk Supplementary Planning Document & Ipswich Flood Defence Management Strategy)
- Babergh District Council (CS12 Sustainable Design and Construction Standards & CS15 Implementing Sustainable Development in Babergh)
- Suffolk Coastal District Council (Development Management Policy DM28 – Flood Risk)
- Waveney District Council (Renewable Energy and Sustainable Construction Supplementary Planning Document)

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Appendix A, Requirements Pre 31st December 2020 (existing requirements)

Document Submitted	Document Description	Outline
Flood Risk Assessment (FZ3 or Site >1Ha)	Evaluation of flood risk (Tidal, fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)	✓
Drainage Strategy/Statement	Document that explains how the site is to be drained using SuDS principles and shall include information on: - <ul style="list-style-type: none"> • Existing drainage (including adjacent roads) • Impermeable Area (Pre and Post Development) • Proposed SuDS • Hydrology/Hydraulic Calculations (see below) • Treatment Design (i.e. interception, pollution indices) • Adoption/Maintenance Details • Exceedance Paths 	✓
Contour Plan	Assessment of topography/flow paths/blue corridors	✓
Impermeable Areas Plan	Plan to illustrate new impervious surfaces	✓
Preliminary Layout Drawings (including landscaping details)	Indicative drawings of layout, properties, open space and drainage infrastructure including: - <ul style="list-style-type: none"> • Cross section/ plan views of basins, side slopes, wet/dry benches, freeboard and volumes/water depths (1:1, 1:30 & 1:100+CC) • Discharge location (outfall) • Main Conveyance network • Form of SuDS and location on the site 	✓
Preliminary Site Investigation Report	Trial pits across the site to BRE 365 and associated exploratory logs (check for groundwater)	✓

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	Minimum cut off of 5mm/hr – alternative half drain time approach probably needed	
Preliminary hydraulic calculations	<ul style="list-style-type: none"> • Greenfield Discharge Rates - using suitable method i.e. FEH, IH124 (ICPSUDS), ReFH2 • Brownfield Discharge Rates - greenfield runoff estimation methods, based on a high runoff soil type (e.g. soil type 5) or use the urban catchment method in the ReFH2 software • Storage Volume/Water depths • Long Term Storage (if required) – Prefer single flow rate rather than LTS approach 	✓
Evidence of any third-party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)	Evidence of any permissions or permits being obtained. Both SCC/AW agree discharge rates if discharging to Sewer	✓

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Appendix B, Requirements Post 31st December 2020 (revised requirements)

Document Submitted	Document Description	Outline
Flood Risk Assessment (FZ3 or Site >1Ha)	Evaluation of flood risk (Tidal, fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)	✓
Drainage Strategy/Statement	Document that explains how the site is to be drained using SuDS principles. Shall include information on: - <ul style="list-style-type: none"> • Existing drainage (including highway systems in adjacent roads) • Impermeable Area (Pre and Post Development) – if unknown, use a conservative estimated impermeable percentage, e.g. 60% and justify • Proposed SuDS (see below) • Hydrology/Hydraulic Calculations (see below) • Treatment Design (i.e. interception, pollution indices) • Adoption/Maintenance Details 	✓
Contour Plan	Assessment of topography/existing flow paths/blue corridors	✓
Impermeable Areas Plan	Plan to illustrate new impervious surfaces + total of numbers	✓

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Preliminary Layout Drawings (including indicative landscaping details)	<p>Indicative drawings of layout, properties, open space and drainage infrastructure including: -</p> <ul style="list-style-type: none"> • Any existing watercourses to be retained within or abutting the site. 3m wide maintenance strip on at least one bankside for future maintenance shall be provided • Any existing blue corridors must be retained or enhanced • Indicative cross section / plan view of basins; depicting, area, side slopes, wet/dry benches, freeboard, volumes and water depths (1:1, 1:30 & 1:100+CC) annotated on a plan. Maintenance strips/access points shall also be shown. • Discharge location (outfall) • Main Conveyance network (open or piped) • Form of SuDS and location on the site <ul style="list-style-type: none"> ○ Publicly accessible SuDS (unfenced) ○ Basins <ul style="list-style-type: none"> ▪ Max 1.5m total depth ▪ Max 1m water depth ▪ 1:4 side slopes with min 1.5m width wet bench if water depth exceeds 0.6m 	✓
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	<ul style="list-style-type: none"> ▪ Min 300mm freeboard ▪ 3m wide maintenance strip with slight reverse fall <p>Swales: Where appropriate i.e. follow contours</p> <ul style="list-style-type: none"> • 1:4 side slopes • Low velocity – adjust gradient and dimensions to suit • If under-drained, will need appropriate no planting easements <ul style="list-style-type: none"> • Legal easements • No planting zones shall follow Sewers for Adoption 6th Edition • Soakaway offsets – appropriate distances depending on geology i.e. low-density chalk =10m offset to dwellings and highway construction. (Ciria C574 	
Preliminary Site Investigation Report	<ul style="list-style-type: none"> • Trial pits across the site in accordance with BRE 365 and associated exploratory logs provided (checks for groundwater). *Infiltration is unlikely to be accepted were rates are below 10mm/hr and infiltration should not be considered where rates are 5mm/hr or less. • Phase 1 Ground Investigation Report (identify any potential contamination) 	✓

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Preliminary hydraulic calculations	<ul style="list-style-type: none"> • Greenfield Discharge Rates - using suitable method i.e. FEH, IH124 (ICPSUDS), ReFH2 • Brownfield Discharge Rates - greenfield runoff estimation methods, based on a high runoff soil type (e.g. soil type 5) or use the urban catchment method in the ReFH2 software • Storage Volumes (with climate change factors applied) • Long Term Storage (if using complex control rather than single flow rate) *SCC Prefer single flow rate rather than LTS approach. • Source control/treatment calculations (or similar). 	✓
Evidence of any third-party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)	<ul style="list-style-type: none"> • Written evidence of any permissions or permits being obtained. • Where discharging to public sewer – both parties have to agree discharge rate i.e. 1yr greenfield rate. 	✓
Health and Safety Risk Assessment	CDM compliant Designers risk assessment for any open SuDs features which contain water greater than 0.3m deep	✓