

13<sup>th</sup> December 2018

Andrew Preston  
Greenslade Taylor Hunt

Our Ref: RMA/LC1739c – Grange Farm, Cannington – EA Letter

Dear Andrew,

**RE: OUTLINE APPLICATION FOR A PROPOSED RESIDENTIAL DEVELOPMENT ON LAND AT GRANGE FARM IN CANNINGTON, NEAR BRIDGWATER, SOMERSET, TA5 2LA – RESPONSE TO EA COMMENTS**

RMA Environmental prepared a Flood Risk Assessment (FRA) to support an outline planning application for a proposed residential development on land at Grange Farm in Cannington, near Bridgwater in Somerset. The purpose of this letter is to provide a technical response in relation to the Environment Agency (EA) comments dated 4<sup>th</sup> December 2018 (refer to Appendix A).

The EA have requested that the proposed development should make a financial contribution towards the maintenance of the Cannington Flood Alleviation Scheme (FAS). However, it is considered that the technical reasons provided by the EA to justify this contribution are not valid and, therefore, the proposed development should not be required to contribute financially to the FAS on this basis.

Specifically, from a technical standpoint, the EA's letter states that:

*“the development intends to dispose of surface water flows from the development into the FAS. It is important to note the FAS was designed to handle fluvial flows only.*

*The disposal of surface water into the FAS is likely to result in an increased maintenance burden and potential modifications to the scheme may be required. Effective disposal of surface water and operation of the FAS is required to ensure the development is safe in flood risk terms for its lifetime without increasing flood risk elsewhere. Paragraph 163 of the National Planning Policy Framework refers.”*

At present, the site drains naturally into the FAS at greenfield runoff rates and the drainage strategy for the proposed development will limit runoff to the existing greenfield rates using Sustainable Drainage Systems (SuDS), as detailed in the FRA. As such, surface water drainage from the proposed development will mimic the existing drainage arrangement at the site and will not increase surface water runoff rates into the FAS.

There will be no increase in fluvial flows within the FAS; surface water runoff from the site already contributes to fluvial flows in the FAS (at greenfield rates), as the site clearly lies within the catchment area of the watercourse.

Consequently, the proposed development would have no increased maintenance burden on the FAS and no modifications to the scheme will be required. The proposed development may require a discharge outlet to provide a surface water connection to the FAS; however, this will be implemented and maintained at the cost of the developer and the principle of this connection has already been agreed with the EA.

Furthermore, it should be noted that a discharge to the FAS is not the preferred drainage strategy and, subject to the results of infiltration testing at the detailed design stage, surface water runoff could be discharged to the ground using infiltration-based SuDS.

The proposed development has already facilitated future maintenance of the FAS through the inclusion of an 8 m maintenance buffer along the watercourse and this has represented a financial loss through the reduction of developable area at the site.

The FRA has demonstrated that the proposed development will be safe over its operational lifetime and that it would not increase flood risk elsewhere (including to the FAS).

## **Summary**

This response to the EA's letter has concluded that the technical reasons provided to justify a financial contribution are not valid and, therefore, the proposed development should not be required to contribute financially to the FAS on this basis. I trust that the information supplied in this letter is sufficient; however, should you have any further questions or comments, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Yeo', with a stylized, cursive script.

**Nick Yeo**  
**Environmental Consultant**

**Appendices:** Appendix A - EA Letter

**Appendix A:**  
**EA Letter**

Mr Adrian Noon  
Sedgemoor District Council  
Development Control  
Bridgwater House King Square  
Bridgwater  
Somerset  
TA6 3AR

**Our ref:** WX/2018/132290/02-L01  
**Your ref:** 13/18/00040/DD  
**Date:** 04 December 2018

Dear Mr Noon

**OUTLINE APPLICATION WITH SOME MATTERS RESERVED, FOR THE ERECTION OF UP TO 73NO. DWELLINGS (INCLUDING 30% AFFORDABLE) AND THE FORMATION OF ACCESS AT LAND NORTH OF GRANGE FARM, MAIN ROAD, CANNINGTON, BRIDGWATER**

Thank you for your email of 14 November 2018.

We have carefully considered the points raised in your correspondence. In the absence of this necessary planning contribution being secured via S106 agreement, the Environment Agency must maintain its objection to the proposal on flood risk grounds.

As highlighted in our earlier response, this proposal would directly benefit from the Cannington Flood Alleviation Scheme (FAS). Additionally, the development intends to dispose of surface water flows from the development into the FAS. It is important to note the FAS was designed to handle fluvial flows only.

The disposal of surface water into the FAS is likely to result in an increased maintenance burden and potential modifications to the scheme may be required. Effective disposal of surface water and operation of the FAS is required to ensure the development is safe in flood risk terms for its lifetime without increasing flood risk elsewhere. Paragraph 163 of the National Planning Policy Framework refers.

We remain of the view this contribution is necessary and meets the tests laid out in Part 11 of the Community Infrastructure Levy Regulations 2010. In that it is required to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development.

If you are minded to approve the application contrary to our flood risk objection and national planning policy, it is considered essential that you contact the Environment Agency using the details below to discuss the implications prior to determination of the

Environment Agency  
Rivers House East Quay, Bridgwater, Somerset, TA6 4YS.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

application.

A copy of this letter has been forwarded to the Agent. We trust this further clarifies the Agency's position. Please do not hesitate to contact the undersigned direct should you have any further queries.

Yours sincerely

**Mark Willitts**  
**Sustainable Places - Planning Advisor**

Direct dial 02030 250253  
e-mail [nwx.sp@environment-agency.gov.uk](mailto:nwx.sp@environment-agency.gov.uk)

cc Greenslade Taylor Hunt