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Flood Risk, Planning, and
Consenting Team
Whitebeam Lodge
Merrow Lane
Guildford
Surrey
GU4 7BQ

Recommendation (mark one with X)

Further/amended information required	
No objection	
No objection – Subject to conditions	
Objection	X

Our ref: LLFA-GU-25-1573
Your ref: 25/P/01521
Date: 12/12/2025

Dear Planning Authority,

Shortlands Farm, Guildford Road, Ash, Guildford, GU12 6DF

Thank you for consulting Surrey County Council (SCC) as the Lead Local Flood Authority (LLFA) on the above Outline Planning Application. We have reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements of the NPPF, its accompanying PPG and the National standards for sustainable drainage systems.

The Local Planning Authority should be aware that some of the requirements of the National standards for sustainable drainage systems fall outside of the LLFA's statutory consultee remit and therefore the views of other consultees (where relevant) should be considered in relation to the following: Standard 5: amenity and Standard 6: biodiversity.

As part of our statutory consultee role our advice relates to surface water flood risk and surface water drainage only, the Environment Agency should be contacted for advice in relation to fluvial flood risk.

Consultation request date: 04/12/2025

The following documents submitted as part of the above application have been reviewed and should be referred to as part of any future submissions:

- Flood Risk Assessment, Aegaea, October 2025, revision 1, document reference: AEG7630_GU12_Ash_07;
- Hydraulic Model Report, Aegaea, October 2025, revision 001, document reference: AEG7630_GU12_Ash_03;
- Drainage Strategy, Aegaea, October 2025, revision 4, document reference: 7630_GU12_Ash_07;
- Phase 1 and Phase 2 Geo-environmental and Geotechnical Interpretative Report, RSK, October 2025, revision R01, document reference: 1923899 R01 (01);

We object to the proposed development. The proposed surface water drainage scheme does not meet the requirements set out in the NPPF, its accompanying PPG and the National standards for sustainable drainage systems.

Insufficient information has been provided and significant issues have been identified, to overcome this, the following changes and information are required:



The application site comprises 10.18 ha of land and therefore is classified as 'Major' Development. Any planning application classified as Major Development will need to include a detailed drainage strategy. As per the NPPF, all 'major' planning applications being determined must include full details about surface water drainage and sustainable drainage systems, which is a material consideration.

Paragraph 181 (Feb 2025) of NPPF states:

'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Paragraph 182 (Feb 2025) of NPPF states:

'Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

a) take account of advice from the Lead Local Flood Authority;

b) have appropriate proposed minimum operational standards; and

c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.'

Reasons for Objection:

The development offers the opportunity to utilise a range of sustainable surface water management techniques which not only contribute to a reduction in discharge rates from the site, but provide amenity, biodiversity and water quality improvements and contribute to mitigating climate change by considering both drought and flood conditions. Justification should be provided as to why SuDS features such as; rainwater harvesting, green/blue roofs, permeable paving, downpipe planters, attenuating tree pits, raingardens etc have not been utilised.

Standard 1: runoff destinations

No evidence has been provided which confirms how Standard 1 has been met. The applicant has not demonstrated that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy. Garden water butts are not classified as rainwater harvesting with regards to priority 1.

Surrey is located within a 'Water Stressed Area' as defined in the Environment Agency's Water stress areas no consideration has been given to the Priority 1.

Details regarding the condition, capacity and connectivity of the watercourses within and adjacent to the development site should be submitted to ensure that an outfall for the site is viable if rainwater harvesting and infiltration cannot manage the peak design storm events.

Standard 2: management of everyday rainfall (interception)

No evidence has been provided which confirms how Standard 2 has been met.

Standard 5: amenity

No evidence has been provided which confirms how Standard 5 has been met.

Standard 6: biodiversity

No evidence has been provided which confirms how Standard 6 has been met.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

No evidence has been provided which confirms how Standard 7 has been met.

Should the Applicant wish to discuss our concerns in more detail we provide a pre-application advice service, details of which are available on our website:

[Sustainable Drainage Systems \(SuDS\) planning advice - Surrey County Council](#)

A full list of the information we expect to receive as part of Outline Planning Application can also be found using the above link.

We object to the development proposed as set out above; however, in the event that planning permission be granted by the Local Planning Authority against our recommendations, suitably worded conditions should be applied. Suggested conditions are below:

- 1) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must be compliant with the National standards for sustainable drainage systems and the NPPF. The required drainage details shall include:
 - a) The results of further infiltration testing completed in accordance with BRE Digest: 365 in the location of proposed soakaways and confirmation of groundwater levels. Where infiltration is proposed confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
 - b) Evidence that the receiving watercourse has onward connectivity and capacity to receive flows from the site.
 - c) Evidence that the surface water drainage system meets the management of everyday rainfall (interception) requirements of the National standards.
 - d) Hydraulic calculations to demonstrate the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events and 10% allowance for urban creep. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of **3.5 l/s/ha**.
 - e) Detailed design drawings for all sustainable drainage elements including cross sections and detailed drainage layout plan.
 - f) An exceedance flow routing plan demonstrating no increase in surface water flood risk on or off site. The plan must include proposed levels and flow directions.
 - g) Evidence that the surface water drainage system meets the water quality requirements of the National standards.

- h) Evidence that the surface water drainage system meets the amenity requirements of the National standards.
- i) Evidence that the surface water drainage system meets the biodiversity requirements of the National standards.
- j) Details of drainage management responsibilities and maintenance regimes for all drainage elements.
- k) Details of how surface water will be managed during construction including measures to protect on site and downstream systems prior to the final drainage system being operational. Including details of how existing watercourse on and adjacent to the site will be protected.

Reason: To ensure the design meets the National standards for sustainable drainage systems and the final drainage design does not increase flood risk on or off site.

- 2) Prior to the first occupation of the development, a verification report must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), confirming any defects have been rectified. Provide the details of any management company. Provide an 'As-Built' drainage layout and state the national grid reference of key drainage elements.

Reason: To ensure the Drainage System is designed to the National standards for sustainable drainage systems.

Informatives

- 1. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent.
- 2. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.
- 3. Sub ground structures should be designed so they do not have an adverse effect on groundwater.

If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use our reference number in any future correspondence.

Yours faithfully

Mike Burch
Critical Drainage Specialist
For the Flood Risk, Planning, and Consenting Team