



Committee and Date
North Planning Committee
17th September 2019

Item
10
Public

Development Management Report

Responsible Officer: Tim Rogers
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Summary of Application

Application Number: 19/02572/FUL	Parish:	Shrewsbury Town Council
Proposal: Erection of 2no semi-detached dwellings		
Site Address: Prospect House Belle Vue Road Shrewsbury Shropshire SY3 7NR		
Applicant: Furrows Holdings		
Case Officer: Toby Cowell	email:	planning.northern@shropshire.gov.uk

Grid Ref: 349766 - 311849



Recommendation:- Grant Permission subject to the conditions set out in Appendix 1.

Recommended Reason for Approval

REPORT**1.0 THE PROPOSAL**

- 1.1 Planning permission is sought for the erection of a pair of 3-bedroom semi-detached dwellings and associated landscaping. The dwellings would be laid out over two storeys and incorporate gable fronted windows serving the first floor accommodation spanning the eaves in the front elevation, and complimented by 2 rooflights per dwelling at the rear. 1.8m high close boarded timber fencing would enclose the associated amenity area for each dwelling at the side, with a combination of varying species of shrubbery and block paving immediately in front of each dwelling adjacent to the existing car park.

2.0 SITE LOCATION/DESCRIPTION

- 2.1 The site comprises a moderately sized vacant parcel of land consisting of scrub and hardstanding (redundant parking) sited directly south (adjacent) of an existing residential car park accessed from Belle Vue Road to the west. The site is located directly west from the residential apartment block of Prospect House, and at the rear of No. 8 Brougham Square (south-east) and No. 47 Belle Vue Road (north-west). The site is located within the Belle Vue Conservation Area, but not directly visible from Belle Vue Road due to the substantial set back from the streetscene (approx. 35m).

3.0 REASON FOR COMMITTEE/DELEGATED DETERMINATION OF APPLICATION

- 3.1 This application does not meet the criteria for delegated decisions as set out in the Council's adopted 'Scheme of Delegation' due to the conflict between the Town Council's objection and the officer recommendation.

4.0 Community Representations**4.1 - Consultee Comments****4.1.1 Shrewsbury Town Council**

The Town Council objects to this planning application on the following grounds:

- Members feel that these proposals represent an overdevelopment of a confined and narrow space in an existing car park;
- Members are concerned that the application lacks amenity space for the residents of the properties;
- With the front doors to the proposed properties opening immediately on to the main entrance and car park for Prospect House, Members have expressed

concerns in respect of safety issues for both residents of the properties and those using the access road to the neighbouring buildings.

4.1.2 **SUDS**

The technical details submitted for this Planning Application have been appraised by WSP UK Ltd, on behalf of Shropshire Council as Local Drainage Authority. No objection, subject to conditions and informatives.

4.1.3 **SC Conservation**

This application follows on from a formal Pre-application enquiry where we provided initial comments on potential residential development along the southerly boundary of the linear double row of parking spaces accessed off Belle Vue Road which provide parking to the now residentially converted Prospect House. We have also previously provided comments on applications related to the recent conversion of the former Maltings occupying the wider site from office use to residential, where this prominent building is considered to comprise a non-designated heritage asset reflecting the site's industrial past. As noted previously this site and the wider area is located within the Belle Vue Conservation Area.

As recommended in our earlier comments, a heritage impact statement has now been prepared relevant to this formal proposal for two semi-detached dwellings sited within this very narrow strip of land. The D and A Statement notes that the design, scale and form of the proposed dwellings reflects those in the immediate area of the site and will pick up traditional materials in the area including red brick and a traditional slate roof with lead detailing.

As earlier advised this proposal would require that due regard is given to the following local policies and guidance: SC Core Strategy policies CS6 (Sustainable Design and Development) and CS17 (Environmental Networks), SC SAMDEV policies MD2 (Sustainable Design), MD13 (The Historic Environment), and with national policies and guidance including the National Planning Policy Framework (NPPF) revised 2018. In legislative terms Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is applicable in considering the impact of the proposal on the character and appearance of the Conservation Area.

Having considered the Heritage Impact Assessment I do not disagree with its conclusions, and also in principle do not disagree with the design rationale described in the D and A Statement in this case for this rather limited and tight site. I would refer you to the comments from the Civic Society in terms of possible additional greening and improved amenity given the very stark context of this site especially to the front of the proposed buildings.

The design is somewhat plain (but the stepping of the two units and the brick pilaster articulation to the front elevation is noted) which however is not necessarily a negative aspect of the proposal, but to improve on this a very high level of detail and very good quality materials should be strived for, and to that end conditions on all external materials (Condition CC1), window and door details (based on Condition JJ20) and rooflights (based on Condition JJ8) should be imposed should this application be approved, along with any additional landscaping measures that could improve the current proposal. Further

articulation looking at the brick detailing of Prospect House could also be incorporated to improve the design potentially and would better tie the proposed dwellings to the earlier main building on the site.

Overall no objection is raised on heritage grounds and in terms of design and detailing I would refer you to the recommended conditions noted above and related observations and suggestions.

4.1.4 **SC Archaeology**

We have no comments to make on this application with respect to archaeological matters.

4.1.5 **Shrewsbury Civic Society**

The Committee is not against development of this somewhat squashed site. However, we found it to be a rather strange and slightly off-putting proposal.

The documentation makes it clear how the pre-application advice has led to certain features of the design. For example, it is good to see the use of nearby traditional building materials and techniques, such as red brick, slate tiles, cambered lintels and pilasters. However, the resultant buildings were not seen as having high quality design. Indeed one description was “a bit banal”.

Part of this is the result of the setting which provides only a narrow plot with very small garden areas and fronting onto a car park, with little or no space between and no possibility of projections such as front-door porches, etc. The planting scheme is detailed but the lack of space can provide little mitigation to this very “built” environment.

We feel that there could be some further work done to increase greening and mitigate some of the negative aspects of this otherwise well-devised proposal.

Perhaps this application could be further considered.

4.1.6 **SC Regulatory Services**

Regulatory Services has identified the proposed development site as potentially contaminated land due to our knowledge of previous site investigations in the area and past potentially contaminative uses both on and adjacent to the site. Conditions recommended.

4.1.7 **SC Affordable Houses**

No comments received at the time of writing the report.

4.1.8 **SC Highways**

The proposal seeks to erect a pair of semi-detached dwellings within the grounds of Prospect House, Belle Vue Road, Shrewsbury. Each new dwelling will be allocated two parking spaces. Prospect House has recently been converted into apartments and it is considered that the addition of two dwellings would be unlikely to significantly impact the current car parking situation or the surrounding highway network.

No objection; subject to conditions and informatives.

4.2 - Public Comments

- 4.2.1 This application was advertised via notice at the site. Additionally, the residents of 13 neighbouring properties were individually notified by way of publication. At the time of writing this report, no letters of representation had been received as a result of the publication.

5.0 THE MAIN ISSUES

- 5.1 **Principle of development**
Character and appearance
Residential amenity
Highways
Drainage

6.0 OFFICER APPRAISAL

6.1 Principle of development

- 6.1.1 Core Strategy Policies CS1, CS3, CS5 and CS11 seek to steer new housing to sites within market towns, other 'key centres' and certain named villages. Policy CS4 also allows for the identification of 'Community Hubs and Clusters' within the rural area where further housing development can happen; these hubs and clusters were designated as part of the adoption of the Council's Site Allocations and Management of Development (SAMDev) plan.
- 6.1.2 The NPPF states that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF also states that one of its core planning principles is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 6.1.3 Policy CS6 of the Core Strategy seeks to ensure development protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character.
- 6.1.4 The provision of housing within the urban area of Shrewsbury accords with the adopted SAMDev Plan Policy S16. Core Strategy Policy CS2 and MD1 of the SAMDev identifies Shrewsbury as the primary focus for housing development for Shropshire. S16.1 states that Shrewsbury will provide the primary focus for development for Shropshire, as a sub-regional centre and Shropshire's growth point, providing approximately 6,500 dwellings during the period 2006-2026.
- 6.1.5 The site is located within an existing built-up area within Belle Vue, Shrewsbury, and within walking distance to the town centre which benefits from a wide variety of good transport links, local shops, services, amenities and facilities. It is therefore considered that the application site would constitute a highly sustainable location with respect to new residential development, and is located

without what primarily comprises an existing residential area within Belle Vue.

- 6.1.6 It should also be further emphasised that the proposed development would make use of an existing brownfield site, and Section 11 of the NPPF places great importance on planning policies and decisions giving substantial weight to the value of using suitable brownfield land within settlements for homes. Paragraph 38 of the NPPF also states that decision-makers at every level should seek to approve applications for sustainable development where possible, and it is considered that the proposed development would constitute a sustainable and effective re-use of an existing brownfield site within an area identified for additional housing within the SAMDev.
- 6.1.7 Consequently, the principle of development is considered to be acceptable, subject to additional considerations including but not limited to the development's impact upon the visual amenities of the locality, including the Conservation Area, and the amenities of surrounding residential properties. Such considerations are explored further in the latter sections of this report.

6.2 Character and appearance

- 6.2.1 Policy CS6 of the Core Strategy requires development to be designed to a high quality using sustainable design principles, which should be responsive to the local character and context of existing development and its wider surroundings. Likewise, SAMDev Policy MD2 requires development to respond positively to local design aspirations, and be reflective of locally characteristic architectural design and details.
- 6.2.2 Core Strategy Policy CS17 advises that development proposals will be required to protect and enhance the diversity, high quality and local character of Shropshire's natural, built and historic environment. SAMDev Policy MD13 further advises that Shropshire's heritage assets will be protected, conserved, sympathetically enhanced and restored by ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings. Development will also be encouraged which delivers positive benefits to heritage assets. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition.
- 6.2.3 At the national level, Paragraph 192 of the NPPF advises that:
- In determining applications, local planning authorities should take account of:*
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.*

- 6.2.4 The Conservation Officer is generally supportive of the proposed development, especially given the fairly tight and constrained nature of the site. The stepping of the two units and brick pilaster articulation to the front elevation is noted and considered to provide a degree of interest to the overall design, however a high level of detail and good quality materials should be utilised as part of the development and this can be controlled by conditions.
- 6.2.5 Revised plans have also been submitted at the request of the case officer showing the insertion of what effectively comprise bricked up windows in the rear elevation which adds a degree of articulation and interest when compared to the previously proposed blank rear facing wall.
- 6.2.6 Whilst only a moderate degree of landscaping is noted at the front of the proposed dwellings, it is accepted that limited provision for landscaping can be accommodated given the site's narrow and constrained nature. Such landscaping as proposed is considered to be sufficient and acceptable in this context, and given the resultant development would only be visible from a communal car parking area as opposed to more prominent views within Belle Vue Road or more significant areas within the public realm. Consequently the limited landscaping proposed, whilst noted, is not considered to weigh heavily against the proposed development which would, in effect, make good use of a brownfield site.
- 6.2.7 In general, the design, scale and built vernacular of the proposed development is considered to successfully integrate with that of the immediate built environment, without detriment to the intrinsic historic character of the wider Conservation Officer; especially given its substantial recession from Belle Vue Road of which it would not materially impact from a visual standpoint.
- 6.3 Residential amenity**
- 6.3.1 Policy CS6 and MD2 seek to ensure that development contributes to the health and wellbeing of communities, including safeguarding residential and local amenity. Paragraph 127 of the NPPF states that planning policies and decisions should ensure that development '*creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users*'.
- 6.3.2 The lack of first floor windows in the rear elevation of each dwelling proposed prevents realistic overlooking with respect to the amenities of existing residential properties at the rear, whilst the addition of rear rooflights still allows for each dwelling to be afforded sunlight and ventilation from the south. Due to location of such dwellings bordering the very rear of the private amenity serving the closest adjacent dwelling to the north-west and south-east, the amenities of such residential properties would not be materially impacted with respect to overshadowing, overdominance or loss of sunlight.
- 6.3.3 Each dwelling would benefit from a moderate degree of private outdoor amenity space to either side. Whilst it is noted that such provision is minimal, it is accepted that the constrained nature of the site prevents a greatly level of provision to be afforded and, in the context of the site's location within close proximity to the town centre, is considered to be sufficient in this case. Each

dwelling would also conform to the Nationally Described Space Standards with respect to the gross internal floor area.

6.3.4 Both dwellings would be afforded outdoor space for the storage of refuse bins as indicated on the submitted landscaping plan, with easy access to the existing car park and the Belle Vue Road streetscene to the west. Concerns have been raised from a safety standpoint given the proximity of the front doorways of each dwelling to the car park. However, such doorways would not open out onto an adopted highway, and indeed actually open onto a moderate block paved area directly in front before occupants would step onto the car parking area to access their parked cars opposite. Such concerns are therefore not afforded a great deal of weight in this case.

6.3.5 In summary, the two dwellings proposed would be afforded a satisfactory level of outdoor amenity that would be fully private and enclosed on all sides, whilst enjoying acceptable living conditions with respect to the internal level of space and outlook to the front over the existing car park. The proposed development is therefore considered to be acceptable in this respect.

6.4 Highways

6.4.1 Policy CS6 'Sustainable Design and Development Principles' of the Shropshire Core Strategy indicates that proposals likely to generate significant levels of traffic should be located in accessible locations where there are opportunities for walking, cycling and use of public transport can be maximised and the need for car based travel to be reduced. This policy also indicates that development should be designed to be safe and accessible to all.

6.4.2 The Highways Authority have raised no objection to the proposed development and consider that the addition of two further dwellings would not significantly impact the current parking situation or the surrounding highway network. It is noted that each dwelling would be allocated two parking spaces within the adjacent car park which would be sold together with each property. Such provision is considered to be acceptable, and no further concerns are raised from a highways standpoint.

6.5 Drainage

6.5.1 Policy CS18 'Sustainable Water Management' of the Shropshire Core Strategy indicates that development should integrate measures of sustainable water management to reduce flood risk, avoid an adverse impact on water quality and quantity and provide opportunities to enhance biodiversity. The proposal has been assessed by the Council's Drainage Engineer who has not raised any objection, provided that details pursuant to surface and foul water drainage are provide prior to the commencement of development by way of condition and an informative in relation to sustainable drainage principles is attached to any approval notice issued. In view of the above it is considered that an appropriate drainage system can be installed to meet the requirements of the NPPF and Policy CS18 of the Core Strategy.

7.0 CONCLUSION

The proposals are considered to constitute an effective and sustainable use of previously development land, with the principle of development deemed acceptable within an existing residential area. Moreover, such development is not

considered to adversely impact the visual amenities of the immediate locality, including the wider Conservation Area, nor unduly impact the amenities of surrounding residential properties, or pose a detrimental impact upon the local highway network.

The application is therefore recommended for approval, subject to conditions as recommended in Appendix 1.

8.0 Risk Assessment and Opportunities Appraisal

8.1 Risk Management

There are two principal risks associated with this recommendation as follows:

- As with any planning decision the applicant has a right of appeal if they disagree with the decision and/or the imposition of conditions. Costs can be awarded irrespective of the mechanism for hearing the appeal, i.e. written representations, hearing or inquiry.
- The decision may be challenged by way of a Judicial Review by a third party. The courts become involved when there is a misinterpretation or misapplication of policy or some breach of the rules of procedure or the principles of natural justice. However their role is to review the way the authorities reach decisions, rather than to make a decision on the planning issues themselves, although they will interfere where the decision is so unreasonable as to be irrational or perverse. Therefore they are concerned with the legality of the decision, not its planning merits. A challenge by way of Judicial Review must be made a) promptly and b) in any event not later than six weeks after the grounds to make the claim first arose.

Both of these risks need to be balanced against the risk of not proceeding to determine the application. In this scenario there is also a right of appeal against non-determination for application for which costs can also be awarded.

8.2 Human Rights

Article 8 gives the right to respect for private and family life and First Protocol Article 1 allows for the peaceful enjoyment of possessions. These have to be balanced against the rights and freedoms of others and the orderly development of the County in the interests of the Community.

First Protocol Article 1 requires that the desires of landowners must be balanced against the impact on residents.

This legislation has been taken into account in arriving at the above recommendation.

8.3 Equalities

The concern of planning law is to regulate the use of land in the interests of the public at large, rather than those of any particular group. Equality will be one of a

number of 'relevant considerations' that need to be weighed in Planning Committee members' minds under section 70(2) of the Town and Country Planning Act 1990.

9.0 Financial Implications

There are likely financial implications if the decision and / or imposition of conditions is challenged by a planning appeal or judicial review. The costs of defending any decision will be met by the authority and will vary dependent on the scale and nature of the proposal. Local financial considerations are capable of being taken into account when determining this planning application – insofar as they are material to the application. The weight given to this issue is a matter for the decision maker.

10. Background

Relevant Planning Policies

Central Government Guidance:

West Midlands Regional Spatial Strategy Policies:

Core Strategy and Saved Policies:

CS2 - Shrewsbury Development Strategy
CS6 - Sustainable Design and Development Principles
CS17 - Environmental Networks
CS19 - Waste Management Infrastructure
MD1 - Scale and Distribution of Development
MD2 - Sustainable Design
MD13 - Historic Environment
Settlement: S16 - Shrewsbury
National Planning Policy Framework

RELEVANT PLANNING HISTORY:

PREAPP/15/00072 Conversion of building to residential use and provision of additional residential accommodation within surrounding grounds PREAIP 13th March 2015
15/01786/FUL Change of use from (Use Class) B1 office use to (Use Class) C3 residential use (34 apartments) with minor external alterations GRANT 12th April 2016
16/04722/FUL Creation of three additional flats (amendment to 15/01786/FUL previously approved for conversion to 34 flats) GRANT 6th July 2017
17/03422/DIS Discharge of Conditions 3 (Joinery), 6 (Tree Protection), 7 (Bat Tiles/Bricks) and 8 (Bin/Recycling Store) on Planning Permission 16/04722/FUL for the creation of three additional flats (amendment to 15/01786/FUL previously approved for conversion to 34 flats) DISAPP 1st December 2017
17/03642/DIS Discharge of Condition 4 (Landscaping) on Planning Permission 16/04722/FUL for the creation of three additional flats (amendment to 15/01786/FUL previously approved for conversion to 34 flats) DISAPP 1st December 2017

18/03037/TCA To Fell 30 No Yew Trees within the Shrewsbury Conservation Area CBR 3rd August 2018
 PREAPP/19/00065 Erection of up to 3 no. dwellings within the site of Prospect House (Car Park area) PREAMD 3rd April 2019
 19/02572/FUL Erection of 2 no semi-detached dwellings PDE
 SA/90/1307 Fitting out of office suite and installation of gas boiler and central heating system APPRET
 SA/88/0081 Detailed application for the change of use from Malthouse to Use Class A2 (Financial and Professional Services); Class A3 (Food and Drink (Canteen Facilities)) and Class B1 (Business); as defined in the Town and Country Planning (Use Classes) Order 1987, with associated access arrangements and car parking, and internal/external alterations to Malthouse. PERCON 5th August 1988
 SA/84/0908 Alterations to widen an existing vehicular access from Bynner Street and the erection of entrance gates. PERCON 16th November 1984
 SA/80/0619 Removal of the terminal vent section of the malt kiln roof and replacement at a lower level. PERCON 1st July 1980
 SA/85/0739 Replace unsafe metal cone on top of No. 2 kiln with one similar in appearance to that on No. 1 kiln. PERCON 26th September 1985
 SA/01/0100 Installation of a 600mm satellite dish to the rear elevation. WDN 19th March 2001
 SA/04/0143/TRE Various works to trees in Shrewsbury (Belle Vue) Conservation Area NOOBJC 10th March 2004
 SA/01/1471/CIR Installation of 3 external air cooled condenser units on the existing balcony areas, at third floor level. (amended description) NOOBJC 20th February 2002
 SA/01/1261/F Installation of a 60cm diameter satellite dish on rear elevation. PPNREQ 11th October 2001

11. Additional Information

[View details online:](#)

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)
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Cabinet Member (Portfolio Holder) Councillor Gwilym Butler

Local Member

Cllr Kate Halliday

Appendices APPENDIX 1 - Conditions

APPENDIX 1

Conditions

STANDARD CONDITION(S)

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91(1) of the Town and Country Planning Act, 1990 (As amended).

2. The development shall be carried out strictly in accordance with the approved plans and drawings

Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans and details.

CONDITION(S) THAT REQUIRE APPROVAL BEFORE THE DEVELOPMENT COMMENCES

3. Prior to the above ground works commencing samples and/or details of the roofing materials and the materials to be used in the construction of the external walls shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in complete accordance with the approved details.

Reason: To ensure that the external appearance of the development is satisfactory.

4. Prior to their installation full details of the roof windows shall be submitted to and approved in writing by the Local Planning Authority. The installation of the windows shall be carried out in complete accordance with the approved details.

Reason: To safeguard the architectural and historic interest and character of the Heritage Asset.

5. Prior to the commencement of the relevant work details of all external windows and doors and any other external joinery shall be submitted to and approved in writing by the Local Planning Authority. These shall include full size details, 1:20 sections and 1:20 elevations of each joinery item which shall then be indexed on elevations on the approved drawings. All doors and windows shall be carried out in complete accordance with the agreed details

Reason: To safeguard the architectural and historic interest and character of the Heritage Asset.

6. No development shall take place until a scheme of surface and foul water drainage has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented before the development is occupied/brought into use (whichever is the sooner).

Reason: The condition is a pre-commencement condition to ensure satisfactory drainage of the site and to avoid flooding.

CONDITION(S) THAT ARE RELEVANT FOR THE LIFETIME OF THE DEVELOPMENT

7. All hard and soft landscape works shall be carried out in accordance with the approved plan PL-007A. The works shall be carried out prior to the occupation / use of any part of the

development hereby approved. Any trees or plants that, within a period of five years after planting, are removed, die or become, in the opinion of the Local Planning Authority, seriously damaged or defective, shall be replaced with others of species, size and number as originally approved, by the end of the first available planting season.

Reason: To ensure the provision, establishment and maintenance of a reasonable standard of landscape in accordance with the approved designs.

8. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no development relating to schedule 2 part 1 classes A - E shall be erected, constructed or carried out.

Reason: To maintain the scale, appearance and character of the development and to safeguard residential and / or visual amenities.

Informatives

1. In arriving at this decision Shropshire Council has used its best endeavours to work with the applicant in a positive and proactive manner to secure an appropriate outcome as required in the National Planning Policy Framework, paragraph 38.

2. This planning permission does not authorise the applicant to:

- construct any means of access over the publicly maintained highway (footway or verge) or
- carry out any works within the publicly maintained highway, or
- authorise the laying of private apparatus within the confines of the public highway including any new utility connection, or
- undertaking the disturbance of ground or structures supporting or abutting the publicly maintained highway

The applicant should in the first instance contact Shropshire Councils Street works team. This link provides further details

<https://www.shropshire.gov.uk/street-works/street-works-application-forms/>

Please note: Shropshire Council require at least 3 months' notice of the applicant's intention to commence any such works affecting the public highway so that the applicant can be provided with an appropriate licence, permit and/or approved specification for the works together and a list of approved contractors, as required.

3. In the planning application, it state that the surface water from the proposed development is to be disposed of directly to a main sewer. Such a connection must not be made, as it can result in increased flood risk elsewhere.

The use of soakaways should be investigated in the first instance for surface water disposal. Percolation tests and the sizing of the soakaways should be designed in accordance with BRE Digest 365 to cater for a 1 in 100 year return storm event plus an allowance of 35% for climate change. Alternatively, we accept soakaways to be designed for the 1 in 10 year storm event provided the applicant should submit details of flood routing to show what would happen in an

'exceedance event' above the 1 in 10 year storm event. Flood water should not be affecting other buildings or infrastructure. Full details, calculations, dimensions and location plan of the percolation tests and the proposed soakaways should be submitted for approval.

Surface water should pass through a silt trap or catchpit prior to entering the soakaway to reduce sediment build up within the soakaway.

Should soakaways are not feasible, drainage calculations should limit the discharge rate from the site equivalent to 5.0 l/s runoff rate should be submitted for approval. The attenuation drainage system should be designed so that storm events of up to 1 in 100 year + 35% for climate change will not cause flooding of any property either within the proposed development or any other in the vicinity.

4. Urban creep is the conversion of permeable surfaces to impermeable over time e.g. surfacing of front gardens to provide additional parking spaces, extensions to existing buildings, creation of large patio areas.

The appropriate allowance for urban creep must be included in the design of the drainage system over the lifetime of the proposed development. The allowances set out below must be applied to the impermeable area within the property curtilage:

Residential Dwellings per hectare	Change allowance % of impermeable area
Less than 25	10
30	8
35	6
45	4
More than 50	2
Flats & apartments	0

Note: where the inclusion of the appropriate allowance would increase the total impermeable area to greater than 100%, 100% should be used as the maximum.

Curtilage means area of land around a building or group of buildings which is for the private use of the occupants of the buildings.

5. If non permeable surfacing is used on the new access, driveway and parking area or the new access slopes toward the highway, the applicant should submit for approval a drainage system to ensure that no surface water runoff from the new access run onto the highway.

6. The proposed method of foul water sewage disposal should be identified and submitted for approval, along with details of any agreements with the local water authority and the foul water drainage system should comply with the Building Regulations H2.

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