

Lead Local Flood Authority

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Please ask for: Peter Siret

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Our Ref: F/2025/057507

Your Ref: P0672/25/OUT

Date: 15 July 2025

Dear Tony Pope,

TOWN AND COUNTRY PLANNING ACT 1990 LEAD LOCAL FLOOD AUTHORITY RECOMMENDATION

LOCATION: Land North Of Carisbrook Road Mitcheldean Gloucestershire

PROPOSED: Outline application for the erection of up to 180 residential dwellings (including affordable housing) with public open space, landscaping and vehicular access points (all matters reserved except for means of access)

I refer to the notice received by the Lead Local Flood Authority (LLFA) requesting comments on the above proposal. The LLFA is a statutory consultee for surface water flood risk and management and has made the following observations and recommendation.

Flood Risk

The Flood Risk Assessment with Outline Drainage Strategy (6326/R3; Rev C; February 2025) (FRA) shows that the site is in flood zone 1 and is mostly at low risk according to the Risk of Flooding from Surface Water map. There is an area in the south corner of the site and the corner of the Carisbrooke Road is shown to be high risk, which is also reported by many public comments on the application.

There is no requirement in the National Planning Policy Framework (NPPF) for the development to improve this issue, however, a suitable surface water drainage strategy should ensure it is not made worse and may provide some benefit.

Surface Water Management

Discharge strategy

The geology mapping shows the site is on sandstone bedrock and has freely draining soil and the infiltration tests carried out in the FRA had mixed results, suggesting some minor infiltration may be possible. This is the preferred option according to the discharge hierarchy so further infiltration testing should be carried out to inform a detailed design.

The strategy presented with this application is based on a limited discharge to a ditch on the southern boundary of the site, which is shown to be linked to a watercourse that passes through Vantage Point industrial estate. This is a suitable alternative if further infiltration testing confirms infiltration is not viable.

Discharge rate and volume

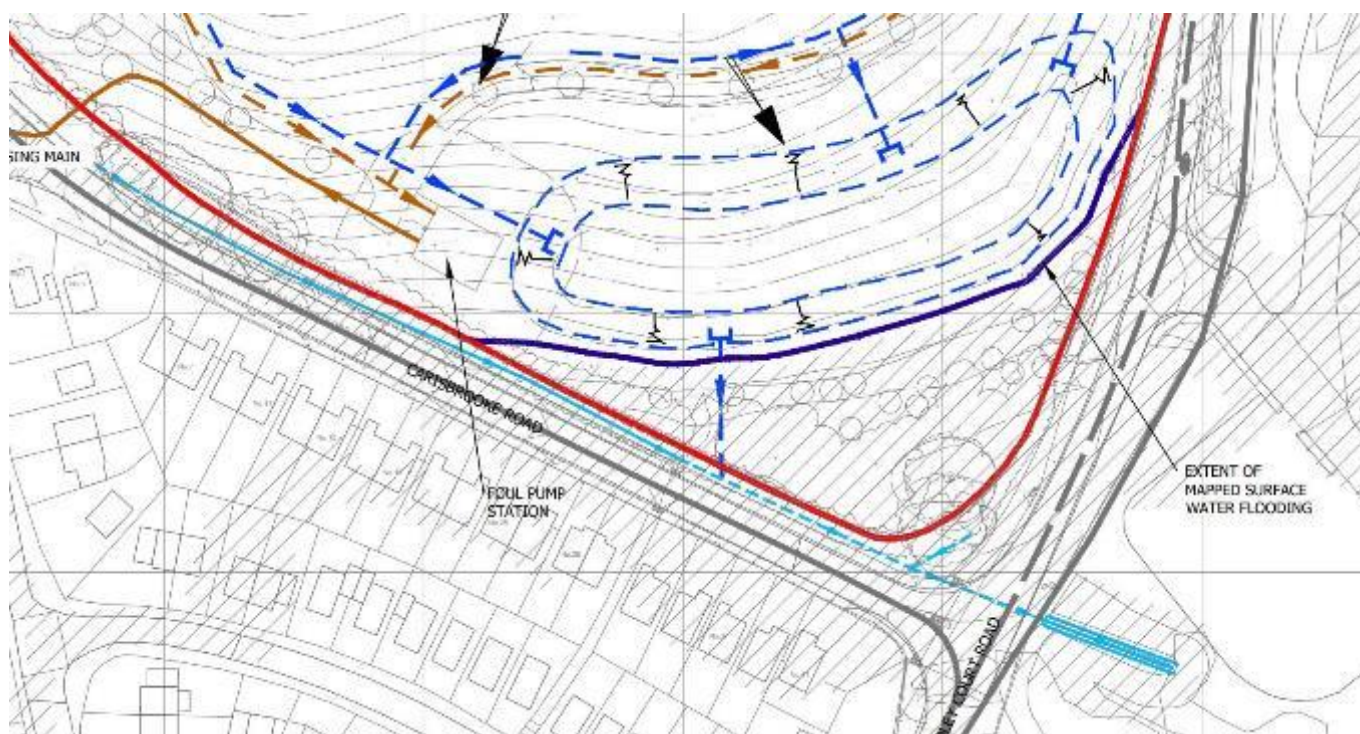
The discharge rate will be limited to 13.84 l/s, which is approximately equal to the greenfield runoff rate for QBar for a developable area of 5.67 ha. Of this, 3.12 ha has been estimated to be made impermeable and positively drained. This will need to be confirmed during a detailed design.

Sustainable Drainage System (SuDS) strategy and indicative plan

SuDS have been incorporated into the design through the use of an attenuation basin. It has been shown that this should be sufficient to accommodate a 1 in 100 year rainfall event plus 40% for climate change, however, other SuDS features have been identified as potential options to include in a detailed design. Their inclusion could ensure a treatment train will help manage the water quality aspects of SuDS. The proposal has the potential to provide amenity and biodiversity benefits to the development.

Further details will need to be provided with a detailed design condition.

The Outline Drainage Strategy (6326/01-04-B) in Appendix 7B shows that the existing watercourse the development will discharge to is outside of the redline boundary (see extract below). Riparian responsibility for the maintenance of watercourses lies with the landowner and not including this within the site provides the opportunity for the watercourse to be missed off any future changes to land ownership or from any maintenance strategies associated with the development. It's the LLFAs view that this and any other watercourses (both open and culverted) on the site are included within the redline boundary so they can be included in future maintenance regimes if the development is granted.



Climate change

Climate change has been incorporated into the design through an increase in peak rainfall intensity of 40%, which is in line with the Environment Agency's latest estimates.

Exceedance flow plan

The route that surface water will flow through the site during rainfall events that exceed the design of the drainage will depend on the final topography of the site and should be provided with a detailed design.

LLFA Recommendation

The LLFA has no objections to the surface water drainage strategy subject to the following conditions, however, recommends the redline boundary is reviewed and, where necessary, the watercourses on the boundary of the site included within it.

Condition: No development shall commence on site until a detailed Sustainable Drainage System (SuDS) Strategy document has been submitted to and approved in writing by the Local Planning Authority, this should be in accordance with the proposal set out in the approved submission (Outline Drainage Strategy 6326/01-04-B). The SuDS Strategy must include a detailed design, infiltration tests carried out to the standard of BRE 365, a timetable for implementation, and a full risk assessment for flooding during the groundworks and building phases with mitigation measures specified for identified flood risks. The SuDS Strategy must also demonstrate the technical feasibility/viability of the drainage system through the use of SuDS to manage the flood risk to the site and elsewhere and the measures taken to manage the water quality for the lifetime of the development. The approved scheme for the surface water drainage shall be implemented in accordance with the approved details before the development is first put in to use/occupied.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage, flood risk and water quality in the locality.

Condition: No development shall be brought in to use/occupied until a SuDS management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime, has been submitted to and approved in writing by the Local Planning Authority. The approved SUDS maintenance plan shall be implemented in full in accordance with the agreed terms and conditions.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding.

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

Yours sincerely,

Peter Siret
Sustainable Drainage Engineer