

Job Name: First Lane, Whitley

Client Mr S Rogers

Date: 02 2026

Job N^o: IMA-25-124

Covering Letter

1 Introduction

This covering letter is to address LLFA comments dated 07th January 2026. The following recommendations were received from the LLFA and we have noted our responses below:

2 *Demonstration of how the proposals will manage pluvial flood risk supported by appropriate 2d modelling*

IMA Response: There is no 2D Modelling currently available for the site. EA Mapping indicates that the pluvial flood risk for the site is predominately up to 20cm other than in the location of the existing ditches/localised low points. Given that surface water is likely to be contained within the carriageway of First Lane we have therefore estimated that the depth of surface water entering the site in the existing situation will have an average depth of 125mm if channelled within the kerbs. The proposals are to therefore re-direct surface water flows into the new swale to the west of the site by providing a length of dropped kerbs at the entrance to the site. Levels into the site are raised. The new swale has been designed to accommodate the estimated existing volume of surface water – refer to Appendix F – Surface Water Flood Risk Volumes. Detailed flow exceedance routing can be found within appendix F – Flood Routing for Site Access.

3 *ii. Overland exceedance routes (as per National SuDS Standard 3) which demonstrate how exceedance flows will be safely managed to prevent an increase in risk to people or property.*

3.1 IMA Response: Overland routes are shown on the drainage strategy drawing 25-124-002 within Appendix E with detailed flow exceedance routing for First Lane / access road which can be found on 25-124 – 008 – Flood Routing at Site Access within Appendix F.

3.2 iii. Demonstration that the peak winter groundwater levels are understood and incorporated into the drainage design

3.3 IMA Response: Additional desktop information has now been provided within section 2.4. BGS Maps and soilscape maps indicate low permeability strata for the site. The ArcGIS SFRA mapping also indicates negligible risk for the site. We therefore consider flood risk from groundwater to be low.

4 iv. A drainage strategy which demonstrates how greenfield runoff and volumes will not be increased by the proposed works, provides the required interception storage (in accordance with National SuDS Standards)

4.1 IMA Response: The drainage strategy has now been updated to show a single outfall utilising a permeable subbase. The discharge rate has been restricted to 0.7l/s for all storms up to and including the 1:100 + 45% climate change event. This utilises a 20mm protected orifice plate. This has been chosen as a minimum due to blockage risk. Raingardens have been provided to provide interception; attenuation should be utilised at detailed design stage.

- 5 v. Demonstration that safe access and egress to the site can be achieved during the design storm in line with PPG. We would encourage the applicant to proactively engage the Parish Council in order that local concerns (and supporting evidence of historic flooding) can be fully understood and incorporated into the proposals
- 5.1 IMA Response: We have based the historic flooding on information from the Level 1 Strategic Flood Risk Assessment (2024), The Section 19 Flood Investigation report and the latest EA mapping.
- 5.2 Based upon the information currently available we are proposing to redirect overland flows to the west of the new development and into the new swale. The swale has been sized to accommodate the estimated volumes and if it was to be overwhelmed in an extreme event surface water flows would still discharge to the west and then south of the dwellings, which in essence mimics the current overland flows of surface water off First lane into the field, with no direct risk to proposed properties or lower lying land so Low Flood Risk.
- 5.3 The proposed dwellings also benefit from being in an elevated position offering further protection. Given that any overland flows would be redirected to the west of the proposed access road, we would consider that safe access and egress would be available to the east along First Lane in line with PPG Guidance.