Elite Ecology

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Land off Lynch Road, Thorverton



Independent Technical Review of Hydrology, Flood Risk, and Surface Water Drainage (Planning Application 26/01201/MFUL)

November 2026

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0. Executive Summary

This independent technical review has been prepared on behalf of Thorverton Parish Council in relation to Planning Application 26/01201/MFUL for the proposed development of sixty-six dwellings, access roads, and associated infrastructure on land at Lynch Road, Thorverton, Devon. The purpose of the review is to assess the adequacy of the hydrology, flood risk, and surface water drainage information submitted by the applicant, with particular consideration of existing drainage pathways, groundwater conditions, surface water flood risk, proposed attenuation, and discharge arrangements, and potential effects on surrounding land.

The application site comprises approximately 3.291ha of existing greenfield agricultural land and generally falls from north to south. The development would introduce approximately 1.377ha of impermeable area, increasing to about 1.467ha with allowance for urban creep. An existing 150mm diameter highway drain crosses the site from Lynch Road towards an ordinary watercourse to the south, while an existing field gully currently collects greenfield runoff and discharges into this drain. The northern part of the site is also identified as being subject to high surface water flood risk.

Ground investigation undertaken for the development identified shallow and variable groundwater, generally within approximately 1.0m below ground level, with artesian conditions recorded during one monitoring visit in two boreholes. These conditions have resulted in infiltration being discounted as the principal means of surface water disposal and place greater reliance on the proposed attenuation and controlled discharge strategy.

The applicant proposes to manage surface water through an attenuation-based drainage system comprising an attenuation tank, an above-ground attenuation basin and controlled discharge through the existing highway drainage system towards the ordinary watercourse south of the site. The proposed greenfield discharge rate is based on a QBar of approximately 2.7 l/s/ha, giving a restricted discharge of approximately 3.7 l/s for the proposed impermeable area. The review has identified a number of matters requiring further consideration. These include:

- The interaction between the development and existing surface and potential shallow subsurface flow pathways from higher ground to the north and north-west.
- The acknowledged high surface water flood risk within the northern part of the site.
- The continued function and capacity of the existing highway/land drainage system crossing the site.
- Shallow groundwater conditions and their implications for buried drainage and attenuation structures.
- The adequacy of distributed source-control SuDS measures.
- The consistency between modelled attenuation storage and the storage shown on the Drainage Strategy Plan.
- The adequacy of the proposed exceedance arrangements.
- The status and acceptability of the proposed surface water discharge point.

Of particular significance, Devon County Council, acting as Lead Local Flood Authority, has objected to the application in its current form and has requested additional information before it can be demonstrated that all aspects of the proposed surface water drainage system have been satisfactorily addressed. The LLFA has also identified a discrepancy between the modelled attenuation basin storage and the storage shown on the submitted drainage plan and has requested further consideration of source-control SuDS measures. The purpose of this review is not to assume that the application should be refused on drainage grounds, but to distinguish clearly between:

- Matters that may provide substantive technical grounds for objection.
- Matters requiring further information or clarification before determination.
- Matters that may be capable of being addressed through appropriately worded planning conditions.

At this stage, the available evidence indicates that the proposed drainage strategy contains a number of material unresolved technical matters that should be satisfactorily addressed before the Local Planning Authority can be confident that the development will not increase flood risk on or off the site. The detailed findings and recommendations are presented in the subsequent sections of this report.

Overall Technical Opinion

The underlying concept of restricting developed runoff towards greenfield rates is technically reasonable and the submitted documents demonstrate that meaningful design work has been undertaken. However, the evidence presently available does not demonstrate a sufficiently resolved, internally consistent and agreed drainage solution for the Parish Council to withdraw its drainage objection. The current LLFA objection is technically significant and is consistent with the principal findings of this independent review.

It is recommended that Thorverton Parish Council maintain a technical objection to the application in its current form until the applicant has resolved the fundamental drainage matters identified in this report and the revised information has been reviewed satisfactorily by Devon County Council as Lead Local Flood Authority.

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Abbreviations and Acronyms

Abbreviation / Acronym	Meaning
AEP	Annual Exceedance Probability
CIRIA	Construction Industry Research and Information Association
DCC	Devon County Council
FEH	Flood Estimation Handbook
FRA	Flood Risk Assessment
LLFA	Lead Local Flood Authority
mAOD	Metres Above Ordnance Datum
Q_{Bar} ($\bar{Q}$)	Mean Annual Flood Flow / Greenfield Runoff Rate
SuDS	Sustainable Drainage Systems
UKSuDS	UK Sustainable Drainage Systems tools / platform

1. Introduction

1.1 Appointment

Elite Ecology was appointed by Thorverton Parish Council to undertake an independent technical review of the hydrology, flood risk and surface-water drainage aspects of Planning Application 26/01201/MFUL. The application relates to land at Lynch Road, Thorverton and proposes construction of sixty-six dwellings, together with access roads and associated infrastructure.

Unlike a conventional Flood Risk Assessment prepared on behalf of a developer, this report does not seek to develop or justify a drainage solution for the proposed scheme. Its purpose is to independently interrogate the applicant's evidence and establish whether the planning submission provides sufficient confidence that flood risk is appropriately managed and is not transferred elsewhere.

1.2 Report Rationale

The development would replace a substantial area of greenfield land with residential buildings, roads, parking areas, and associated infrastructure. This alters rainfall-runoff response and requires engineered drainage. The site also has a clear north-to-south topographic gradient, an existing highway/land drainage route, mapped surface-water risk in the north, shallow groundwater, and a downstream ordinary watercourse.

The central question is therefore not simply whether the proposed pipe network can convey rainfall falling on new impermeable surfaces. The more important question is whether the development has been designed with an adequate understanding of the existing hydrological system into which the drainage infrastructure is being introduced.

1.3 Objectives

1. Assess whether the existing hydrological regime and all relevant flood sources have been appropriately characterised.
2. Assess whether existing surface-water and potential shallow subsurface flow pathways have been adequately considered.
3. Review the adequacy of the proposed drainage, attenuation, discharge and exceedance arrangements.
4. Assess whether groundwater conditions have been properly incorporated into drainage and construction assumptions.
5. Review the statutory LLFA response and determine whether the outstanding matters are material to determination.
6. Distinguish between matters supporting objection, matters requiring further information before determination and matters capable of being secured through planning conditions.

1.4 Scope Limitations

- No independent hydraulic model has been rebuilt as part of this commission.
- No additional intrusive ground investigation, infiltration testing or groundwater monitoring has been undertaken by Elite Ecology.
- The report does not provide a replacement detailed drainage design.
- Ecological matters are considered only where directly linked to hydrological change.
- Legal ownership, easements and drainage rights are not determined by this report.

2. Scope of Technical Review and Policy Context

2.1 Documents Reviewed

Table 1: Principal Technical Documents Reviewed and Their Relevance to the Assessment.

Sn	Document	Reference / date	Relevance
1	Flood Risk Assessment	FRA-R02, Rev 02, August 2026	Primary flood-risk and drainage case
2	Drainage Strategy Plan	Drawing 01.10 Rev C, 21 Aug 2026	Physical drainage layout and attenuation
3	Overland Flood Exceedance Plan	Drawing 01.06 Rev B, 21 Aug 2026	Residual and exceedance routing
4	Surface Water Drainage Model	25.096 SW Storage – Phase 1 – 3.7 l/s	Model assumptions, storage and flow controls
5	Greenfield Run-off Estimation	25.096, 14 Oct 2025	Q_{Bar} and return-period flows
6	Phase 2a Preliminary Ground Investigation	GCE01409/R2v2, June 2026	Groundwater, infiltration and ground conditions
7	Topographical Survey	0846-100	Existing levels and landform
8	Highways and Site Levels Plan	02.00 Rev D	Proposed levels and earthworks
9	Drainage and SuDS Maintenance Plan	DSMP-R01, Apr 2026	Long-term maintenance
10	Surface Water Construction Management Plan	SWMP-R01, Apr 2026	Construction-stage runoff and pollution control
11	Landscape General Arrangement	Submitted landscape plan	SuDS/landscape compatibility
12	LLFA Consultation Response	DCC, 7 Oct 2026	Statutory surface-water drainage position

2.2 National and Local Planning Principles

The relevant planning tests require development to be safe for its lifetime, to avoid increasing flood risk elsewhere, and to incorporate sustainable drainage appropriate to the scale and nature of development. Major development should take account of advice from the Lead Local Flood Authority. The drainage hierarchy and national SuDS standards also require consideration of source control, water quantity, water quality, amenity and biodiversity rather than reliance on end-of-pipe attenuation alone.

2.3 Application of the Policy Tests

For this site, policy compliance cannot be demonstrated simply by the fact that the proposed houses lie in Flood Zone 1. Surface-water flood risk, groundwater, existing drainage assets, external runoff, exceedance, long-term maintenance, and the acceptability of the proposed outfall must all be considered.

3. Site Context and Hydrological Setting

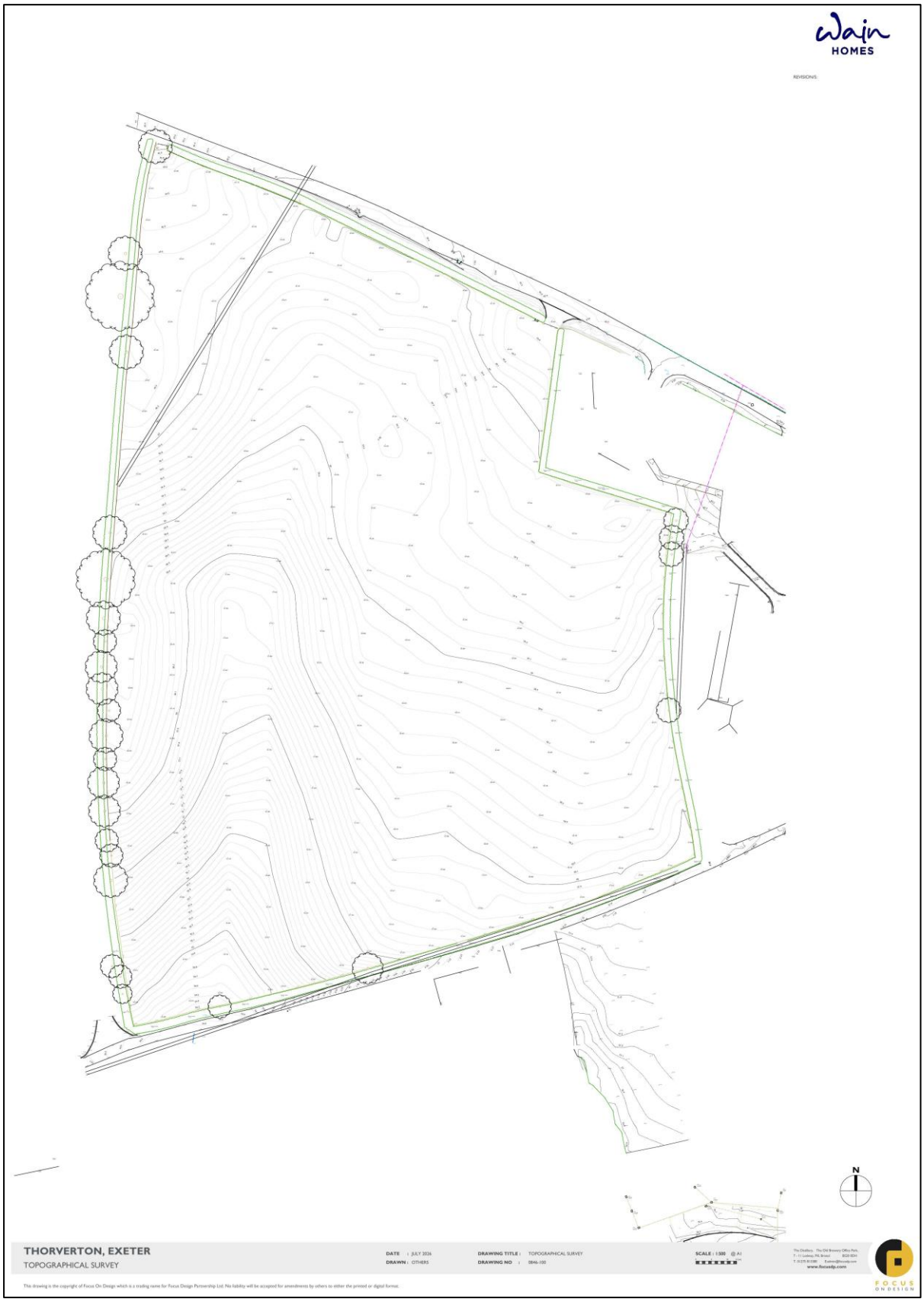
Table 2: Summary of Existing Site Hydrological and Drainage Characteristics.

Sn	Parameter	Value / observation
1	Site area	Approximately 3.291 ha within the current planning boundary
2	Existing use	Greenfield agricultural land
3	Topographic fall	Generally north to south; gradients approximately 1:56 to 1:20
4	Approx. high level	61.02 mAOD at the north-western corner
5	Approx. low level	54.29 mAOD near the south-western corner
6	Existing drainage	150 mm clay highway drain crossing north-south with field gully connection
7	Surface-water mapping	High-risk area identified in the north
8	Groundwater	Shallow and variable; locally artesian during one monitoring round
9	Downstream receptor	Ordinary watercourse south of the site

3.1 Topography

The site falls generally from higher ground in the north and north-west towards lower ground in the south and south-west. The western portion includes a valley-like feature, which is hydrologically relevant because it naturally concentrates runoff. The proposed layout must therefore preserve or safely replace the existing function of these natural drainage pathways.

Figure 1: Existing Topographical Survey and Natural Landform.



Source: Topographical Survey 0846-100 submitted with Planning Application 26/01201/MFUL.

3.2 Existing Drainage Infrastructure

The existing 150mm diameter clay highway drain traverses the site from Lynch Road towards an ordinary watercourse south of the site. An agricultural field gully at the lower part of the site collects greenfield runoff and connects into that drain. The asset therefore currently has a combined highway and land-drainage function. Any diversion or increased reliance on this route must be agreed with the relevant authority and demonstrated hydraulically.

3.3 Groundwater and Geology

Ground conditions comprise variable Head deposits over weathered Thorverton Sandstone Formation. Groundwater monitoring has demonstrated marked seasonal variability. At some monitoring points groundwater was within approximately 1m of ground level; DS01 and DS02 recorded artesian groundwater on one occasion. These conditions materially constrain infiltration and also affect below-ground attenuation, excavation stability, potential uplift, and construction methodology.

4. Proposed Development

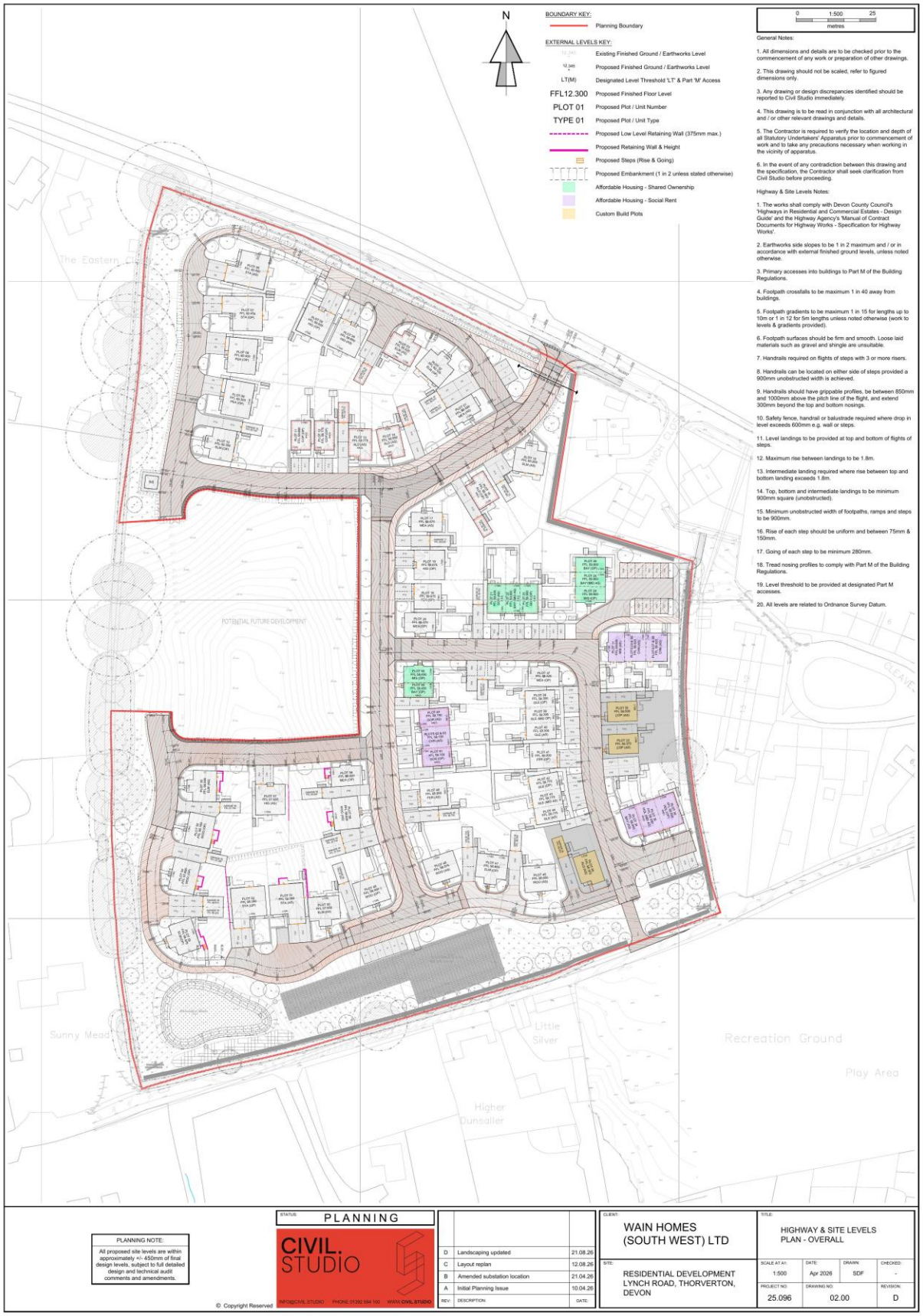
4.1 Development Form

The proposal comprises sixty-six dwellings with internal roads, parking, hardstanding, public open space, landscaping, and associated infrastructure. Access is proposed from Lynch Road. Approximately 1.377ha is identified as impermeable development area, increasing to approximately 1.467ha when a 10% urban-creep allowance is included.

4.2 Proposed Levels

The proposed highways and site-level design introduces local earthworks, finished floor levels, retaining features and new road gradients. These must be considered together with the natural valley feature and mapped surface-water pathways. The critical test is whether the proposed levels preserve safe flow routes during exceedance and avoid creating new low points against property thresholds or neighbouring boundaries.

Figure 2: Proposed highways and site levels – overall plan.



Source: Civil Studio Highways and Site Levels Plan submitted with Planning Application 26/01201/MFUL.

4.3 Proposed Drainage Concept

Because infiltration is constrained by groundwater, the applicant proposes to collect surface water through a piped system, route it through underground attenuation and an above-ground basin, and discharge at a restricted rate through the diverted/existing highway-drainage route towards the ordinary watercourse to the south.

5. Existing Flood Risk and Drainage Conditions

Table 3: Review of Existing Flood Risk Sources and Technical Significance.

Flood source	Applicant / available evidence	Independent review position
Fluvial	Site identified in Flood Zone 1 for direct river flooding.	Not considered a principal constraint.
Surface water	High-risk area identified in north; runoff follows local topography.	Material issue requiring integration with final levels and access.
Groundwater	Shallow and variable groundwater; infiltration constrained.	Material design constraint; not appropriately treated as negligible residual risk.
Sewer/highway drainage	Existing highway/land drain crosses site.	Critical to proposed outfall strategy; agreement/capacity must be established.
Ordinary watercourse	Watercourse south of site receives existing drainage.	Relevant downstream receptor and proposed final receiving environment.
Reservoir/artificial sources	No material risk identified.	No substantive objection identified.

5.1 Fluvial Flood Risk

No evidence reviewed indicates that direct fluvial flooding is a principal reason to resist the proposed residential development. The stronger flood-risk questions arise from surface water, groundwater, and drainage infrastructure.

5.2 Surface-Water Flood Risk

The mapped high-risk area in the north is important because the principal access is also from Lynch Road. The final design must demonstrate that existing surface-water flows can enter, cross or bypass the development safely without being obstructed by buildings, road embankments, walls, or private boundaries.

5.3 Groundwater Flood Risk

The applicant's overall FRA characterises residual groundwater risk as manageable through engineering. That position is reasonable only if groundwater is carried through into the detailed drainage, foundation, excavation and attenuation design. The occurrence of artesian conditions demonstrates that conservative design groundwater levels are required.

6. Existing Hydrological Flow Pathways

6.1 Surface-Water Catchment

The applicant describes the existing site as a typical greenfield parcel where rainfall partly infiltrates and partly follows the natural topography towards the field gully and lower boundary. This broad description is reasonable. However, the analysis does not clearly present the external contributing catchment to the north and north-west or quantify whether runoff from Lynch Road and higher land interacts with the application site or existing highway-drainage system.

6.2 Higher Land and Raddon Hills

Local representatives have raised concern regarding runoff from the Raddon Hills and intervening higher ground. On the present evidence, it would be inappropriate to assert that a significant defined runoff contribution from the Raddon Hills passes directly through the application site. The more defensible position is that the external catchment boundary and flow pathways have not been demonstrated sufficiently and should be explicitly mapped.

6.3 Shallow Subsurface Flow

Shallow groundwater, variable head deposits, and weathered sandstone make lateral subsurface movement plausible. The evidence does not quantify such flow, but the final design should demonstrate that earthworks, retaining structures, foundations, roads and attenuation structures will not create unintended barriers or preferential routes.

6.4 Recommended Flow-Path Evidence

A concise catchment and flow-path plan should be submitted showing existing contours, external catchment boundaries, known highway/land drainage assets, surface-water mapping, likely entry points, the field gully, ordinary watercourse, and proposed interception/diversion arrangements. This would directly address one of the key uncertainties in the current submission.

7. Review of the Applicant's Flood Risk Assessment

7.1 General Adequacy

The FRA is professionally structured and considers the principal conventional flood sources. It identifies the need for climate-change resilience and appropriately recognises that infiltration is unsuitable as the primary disposal mechanism. It also includes greenfield runoff calculations, storage modelling, a drainage strategy, and an exceedance plan.

7.2 Climate Change and Model Basis

The submitted drainage model uses FEH-22 rainfall and a 45% climate-change allowance for the modelled 2-year, 30-year, and 100-year events. On the evidence reviewed, no substantive objection is raised to this design allowance.

Table 4: Key Hydraulic Modelling Parameters and Design Criteria.

Model parameter	Submitted value / approach
Rainfall methodology	FEH-22
Return periods modelled	2-year, 30-year and 100-year
Climate-change allowance	45%
Storm durations	15 to 1,440 minutes
Target final discharge	Approximately 3.7 l/s
Greenfield Q_{Bar}	Approximately 2.7 l/s/ha

7.3 Greenfield Runoff

The HR Wallingford/UKSuDS greenfield runoff estimate uses the FEH Statistical 2025 method and gives Q_{Bar} of approximately 2.7 l/s for a 1ha basis. The applicant then pro-rates the result to the stated impermeable area to derive a target discharge of approximately 3.7 l/s. The methodology is acceptable as a basis for establishing a controlled discharge objective.

7.4 Conclusions of the FRA

The FRA concludes that the development can be undertaken sustainably, that off-site discharge will be reduced and that the LLFA should have no objection. That conclusion is stronger than the present evidence supports. The LLFA has in fact objected and identified unresolved matters that affect the physical deliverability and consistency of the drainage strategy. The FRA conclusion should therefore be regarded as conditional rather than demonstrated.

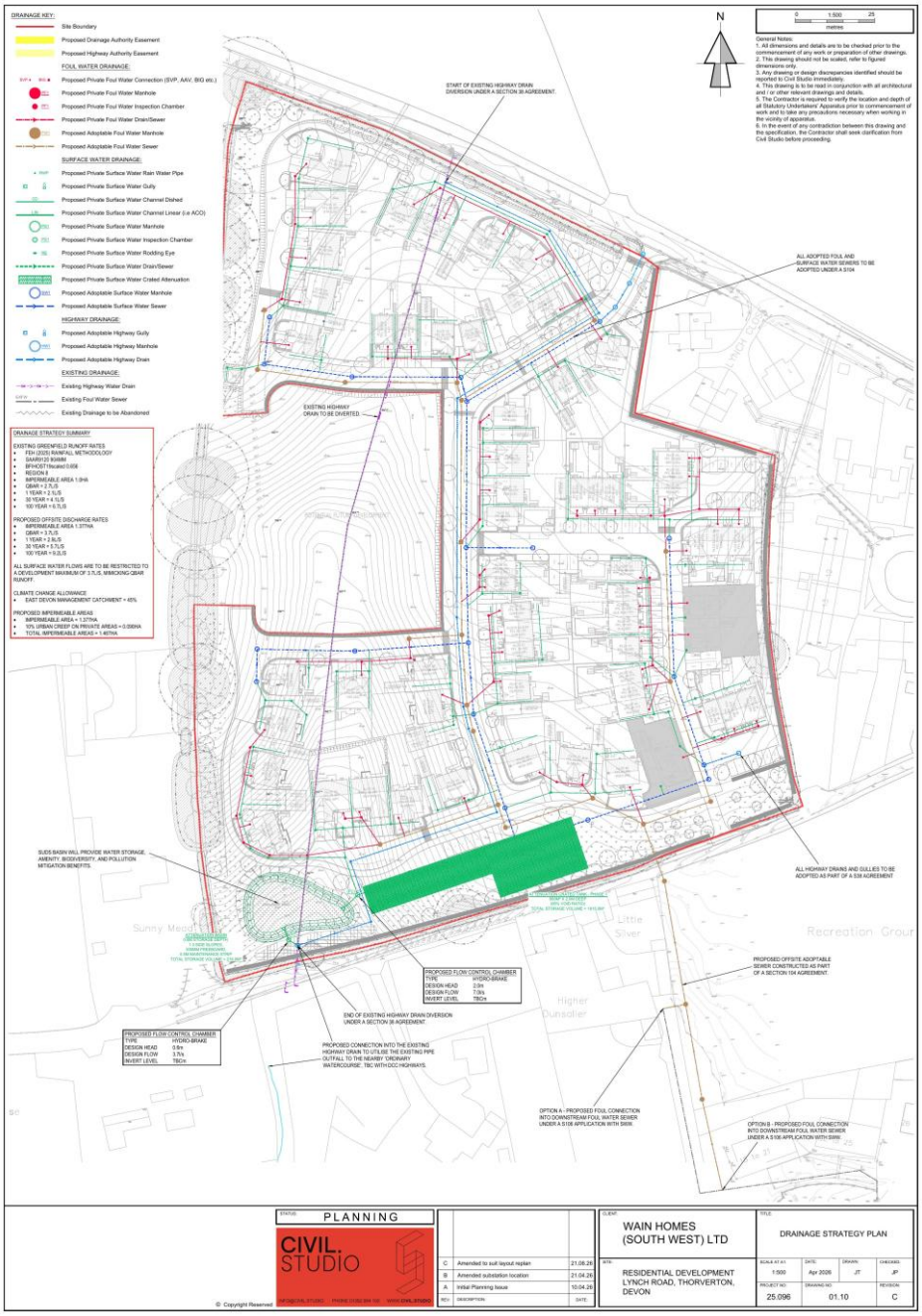
8. Review of the Surface Water Drainage Strategy

8.1 SuDS Hierarchy

The decision not to rely on infiltration is supported by groundwater evidence. Nevertheless, the inability to infiltrate does not remove the requirement for source-control SuDS. Non-infiltrating or lined features such as permeable paving, rain gardens, under-drained bioretention, tree pits, filter strips and swales can still reduce conveyance pressures, improve water quality, and contribute amenity and biodiversity value.

8.2 Drainage Strategy Plan

Figure 3: Submitted Drainage Strategy Plan.



Source: Civil Studio Drawing 01.10 Rev C, submitted with Planning Application 26/01201/MFUL.

8.3 Controlled Discharge

A restricted final discharge of approximately 3.7 l/s is proposed. In principle, controlling runoff towards greenfield QBar is appropriate and should reduce post-development peak discharge compared with an unrestricted developed site. The technical concern is not the target rate itself, but whether the proposed storage and outfall arrangements can demonstrably achieve it.

8.4 Attenuation Storage Discrepancy

This is the most significant internal inconsistency in the submitted drainage package. The LLFA records that the drainage model identifies approximately 433.4m³ of storage for the attenuation basin, whereas the Drainage Strategy Plan indicates approximately 216m³. The difference is approximately 217m³ and cannot reasonably be treated as a minor drafting discrepancy.

Until the model and physical design are reconciled, the Local Planning Authority cannot be confident that the modelled performance represents the drainage system actually proposed for construction. A revised model, plan and storage schedule should be submitted before determination.

8.5 Effective Basin Depth and Freeboard

The LLFA also queries whether the model uses the planned effective basin capacity after allowing for freeboard. The revised drainage package should clearly state invert level, design water level, maximum water level, freeboard, total geometric volume, and effective hydraulic storage volume.

8.6 Groundwater Interaction

The applicant should confirm whether below-ground and above-ground attenuation features are lined, whether anti-flotation or anchoring is required, and how high groundwater will be managed during construction and operation. These are not reasons in themselves to reject attenuation, but they are necessary to demonstrate buildability and long-term reliability.

8.7 Outfall Viability

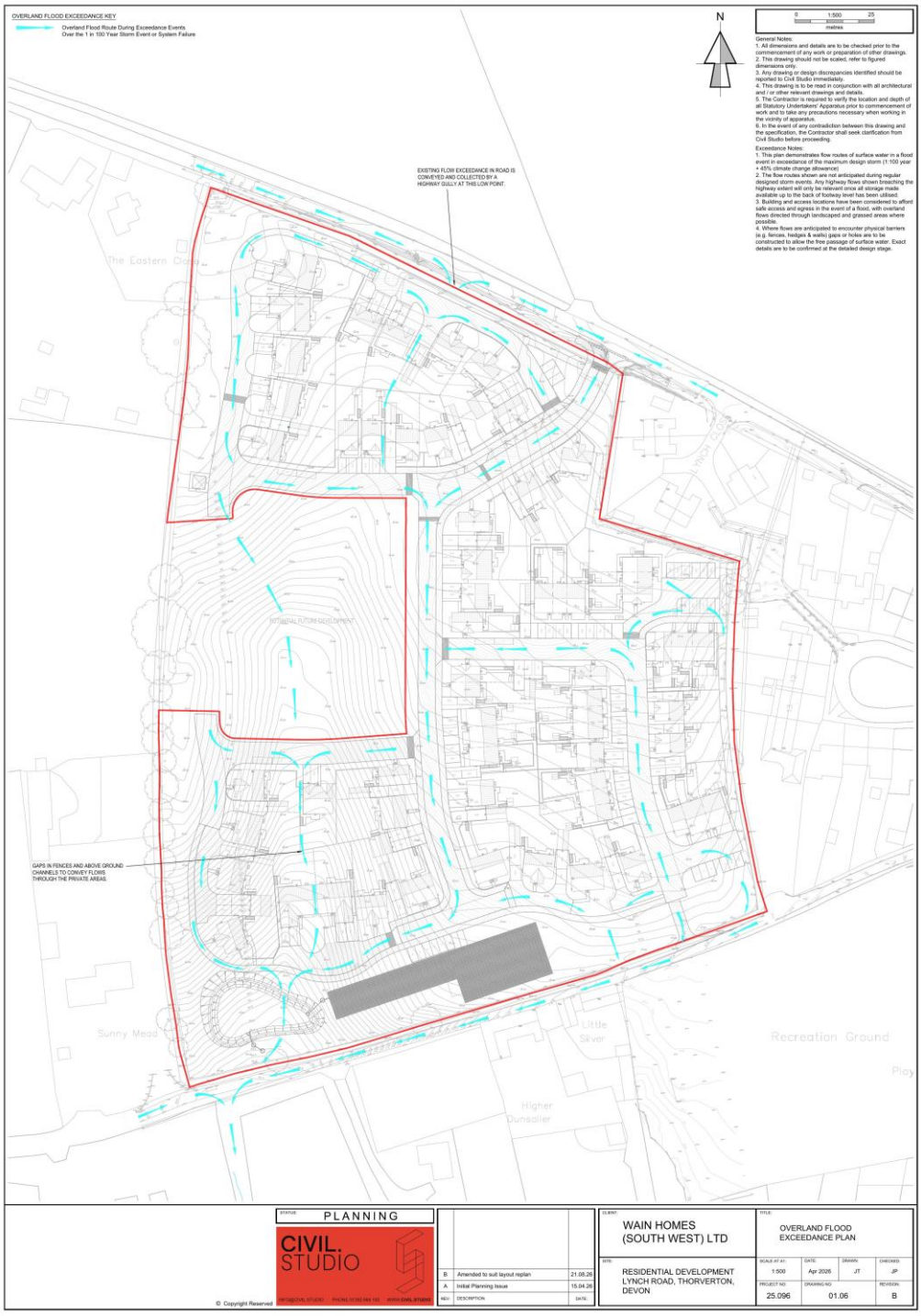
The current absence of agreement in principle for the proposed discharge point is fundamental. The drainage strategy depends on the highway-drainage route and eventual discharge towards the ordinary watercourse. Evidence of an acceptable outfall arrangement should therefore be obtained before determination, rather than leaving the principal disposal mechanism uncertain until detailed design.

9. Exceedance and Residual Flood Risk

9.1 Submitted Exceedance Strategy

The submitted exceedance plan addresses flows in storms beyond the design event or in the event of system failure. It seeks to direct water along roads and through landscaped areas, away from building thresholds and towards lower land.

Figure 4: Submitted Overland Flood Exceedance Plan.



Source: Civil Studio Drawing 01.06 Rev B, submitted with Planning Application 26/01201/MFUL.

9.2 Boundary Openings and Long-Term Reliability

The plan states that where flows encounter fences, hedges or walls, gaps or holes will be constructed to allow free passage of surface water, with exact details to be confirmed at detailed design. This is conceptually acceptable but requires stronger protection in a residential layout. Flow paths should not depend on features that future occupiers can readily block, close or alter.

9.3 Access and Northern Surface-Water Risk

The FRA concludes that safe access to Lynch Road is available at all times. Given the mapped high surface-water risk in the north, that conclusion should be supported by the final road levels and exceedance routing rather than remaining a narrative assertion.

9.4 Residual Risk

The applicant states that there are no residual flood risks requiring management. That wording is too absolute. Any engineered drainage system retains residual risks from blockage, exceedance, maintenance failure and groundwater conditions. The correct planning objective is to show that those residual risks are understood, routed and managed to an acceptable level.

10. Ground Conditions, Groundwater and Infiltration

10.1 Ground Investigation

The Phase 2a Preliminary Ground Investigation provides a substantial evidence base. It identifies variable clay, sand, gravel, and cobble deposits within Head materials and weathered Thorverton Sandstone Formation. This spatial variability is important because permeability, groundwater response and excavation behaviour will not be uniform across the site.

10.2 Infiltration Testing

Groundwater prevented conventional infiltration testing at most trial-pit locations. TP06 was the principal location at which full testing could be completed, with recorded infiltration rates in the order of $3.1–3.8 \times 10^{-5}$ m/s. A local positive test does not overcome the wider groundwater constraint. The decision not to use infiltration as the primary site-wide disposal mechanism is therefore supported.

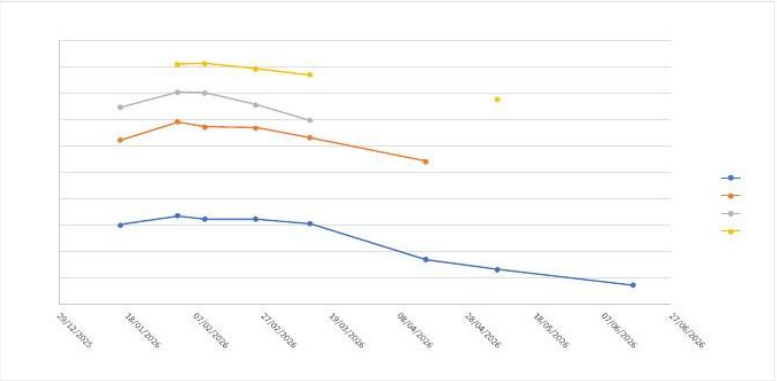
10.3 Groundwater Monitoring

Monitoring from January to June 2026 shows substantial seasonal variation. Shallow groundwater occurred within approximately 1m of ground level in all four monitoring wells at some stage. Artesian conditions were observed in DS01 and DS02 during one monitoring round. Later monitoring showed recession, demonstrating a dynamic groundwater system rather than a single stable groundwater level.

Figure 5: Groundwater level monitoring trend and monitoring results.

GCE01409/R2

The following plot shows the trend of groundwater levels (mAOD) over the monitoring period:



The following table present the groundwater depth in metres below ground level (mbgl):

Borehole	16/01/2026	02/02/2026	10/02/2026	25/02/2025	13/03/2026	16/04/2026
DS01	0.27	-0.08	0.04	0.04	0.23	1.59
DS02	0.65	-0.05	0.15	0.18	0.55	1.45
DS03	1.15	0.55	0.58	1.03	1.63	Dry (>3.09)
DS04	Dry (>1.67)	0.33	0.30	0.51	0.73	Dry (>1.67)

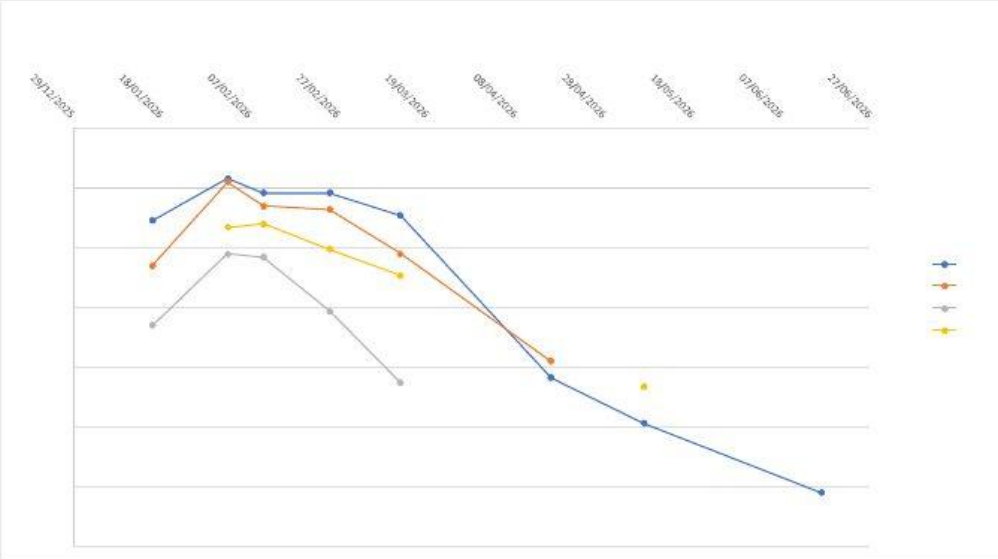
Borehole	07/05/2026	16/06/2026
DS01	1.97	2.55
DS02	Dry (>1.04)	Dry (>1.04)
DS03	Dry (>3.09)	Dry (>3.09)
DS04	1.66	Dry (>1.67)

Source: Geo Consulting Engineering Ltd, Phase 2a Preliminary Ground Investigation GCE01409/R2v2.

Figure 6: Groundwater depth trend and commentary on shallow/artesian groundwater.

GCE01409/R2

The following plot shows the trend of groundwater depths (mbgl) over the monitoring period:



The groundwater monitoring has measured shallow groundwater within 1.0m of ground surface in all four monitoring wells across the site. DS01 and DS02 have also measured artesian groundwater on one occasion, with DS01 groundwater measured at near ground level on a further two occasions. Groundwater appears to be relatively variable, particularly in DS03 when groundwater dropped by circa 0.5m in two weeks from the 10th to 25th February, despite a prolonged wet period in January and the first half of February. Since the peak measured on the 2nd February 2026 monitoring visit, groundwater levels have been steadily declining, with the most recent monitoring visit only having one well with groundwater in, DS01 at 2.55m.

4.4 Ground Gas Monitoring

Ground gas is present on all sites, the composition would normally be similar to atmospheric however, decomposition of organics can result in production of CO_2 in aerobic and CH_4 in anaerobic conditions. Previous industrial processes may result in VOCs.

Source: Geo Consulting Engineering Ltd, Phase 2a Preliminary Ground Investigation GCE01409/R2v2.

10.4 Drainage and Construction Implications

- Possible uplift or flotation of buried attenuation structures.
- Groundwater ingress to excavations.
- Need for temporary dewatering or groundwater management.
- Potential displacement or interception of shallow lateral flow.
- Constraints on foundation and trench construction.
- Need for conservative design groundwater levels and robust lining/anchoring details.

10.5 Technical Position

Groundwater does not make the development inherently unacceptable. It does, however, require explicit engineering treatment. The final design should adopt a conservative seasonal groundwater level and show how attenuation, earthworks, foundations and construction drainage remain functional under those conditions.

11. Potential Downstream and Ecological Hydrological Effects

11.1 Downstream Flow Regime

The existing site drains naturally and through the field-gully/highway-drain system towards lower land and the ordinary watercourse. Development will alter both the quantity and timing of runoff. Restricting peak discharge to approximately greenfield QBar is positive, but peak-flow control alone does not necessarily reproduce the pre-development runoff volume, frequency or hydrograph shape.

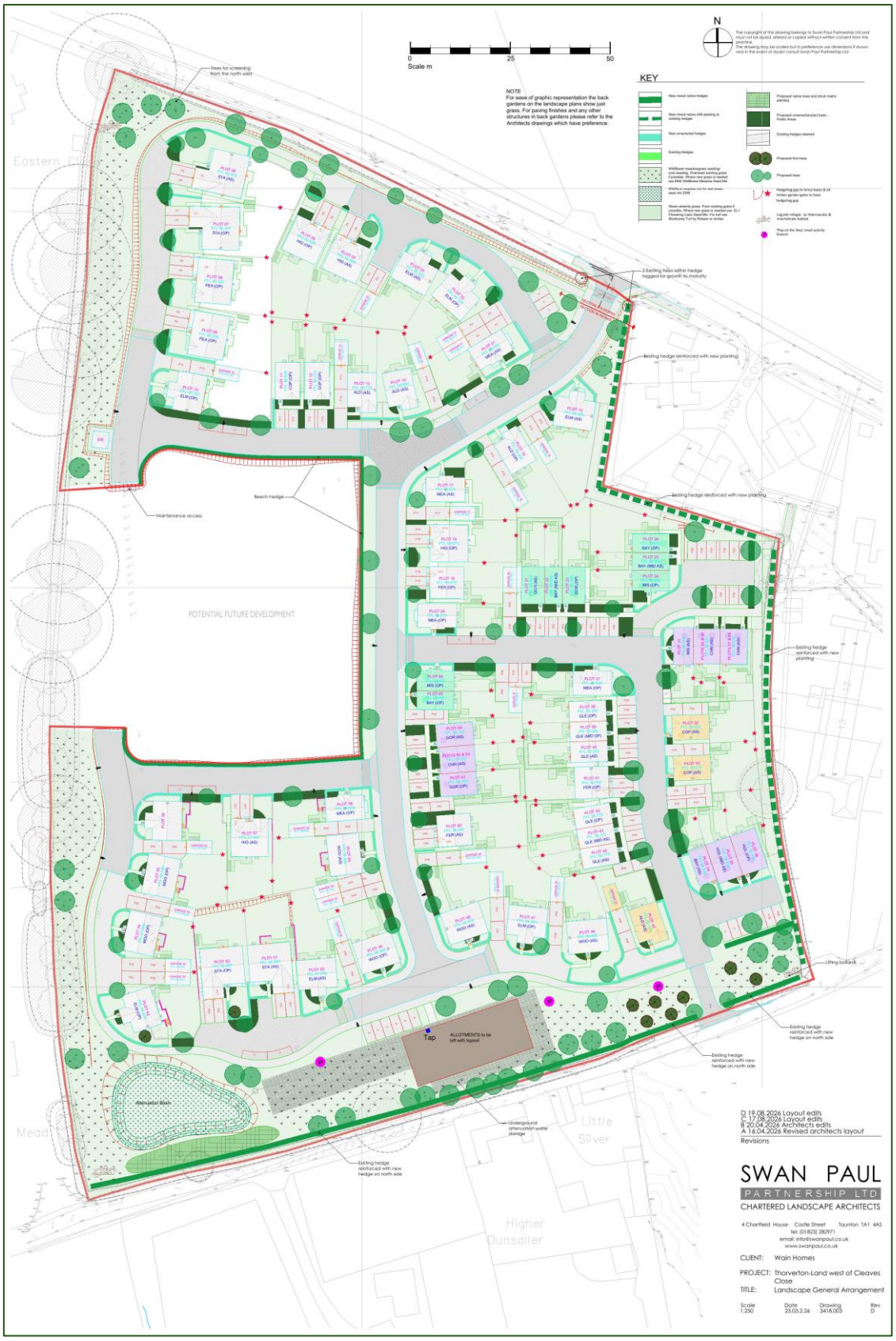
11.2 Orchards and Sensitive Land

Local concerns have been raised regarding sensitive orchards and ecological receptors south of the site. This hydrological review does not provide evidence that the proposal will necessarily cause ecological damage. The appropriate technical test is whether the development materially alters water quantity, flow timing, direction, groundwater contribution, or soil-moisture regime in a way that could affect those receptors.

11.3 Role of Distributed SuDS

Greater use of source-control SuDS would provide a better opportunity to mimic the pre-development response, retain water within the site for longer, reduce concentrated conveyance and support biodiversity. This reinforces the LLFA request for a broader SuDS management train.

Figure 7: Landscape General Arrangement showing the relationship between development, open space and planting.



Source: Submitted Landscape General Arrangement.

12. Review of Statutory Consultee Responses

12.1 Lead Local Flood Authority

Devon County Council Flood and Coastal Risk Management Team issued its consultation response on 7th of October 2026 and currently objects to the application. The LLFA concludes that additional information is required before all aspects of the proposed surface-water management system can be regarded as satisfactorily considered.

Table 5: Assessment of Outstanding Matters Identified by the Lead Local Flood Authority.

Sn	LLFA matter	Independent assessment
1	High surface-water risk in north	Material; should be integrated with final levels and access.
2	Source-control SuDS	LLFA concern is justified; additional distributed measures should be investigated.
3	Lining and anchoring of attenuation	Reasonable requirement given shallow groundwater.
4	Storage discrepancy	Material and requires resolution before determination.
5	Basin depth/freeboard	Directly affects effective hydraulic capacity; clarify before determination.
6	South West Water adoption	Important long-term management matter; can largely progress through detailed design once strategy is proven.
7	Exceedance openings	Requires final-level and boundary-design control.
8	Construction drainage	Conceptual measures exist; detailed drawing/phasing can be conditioned.
9	No agreed discharge point	Fundamental; should be resolved in principle before determination.

12.2 South West Water and DCC Highways

The applicant proposes adoption of relevant drainage infrastructure by South West Water and use/diversion of highway-drainage infrastructure. South West Water adoption is primarily a detailed-design and long-term maintenance matter. By contrast, confirmation that the proposed surface-water outfall route is acceptable to DCC Highways is fundamental to the viability of the drainage concept and should be established before permission is granted.

13. Key Technical Issues and Matters of Concern

Table 6: Consolidated Technical Findings, Significance, and Recommended Actions.

No.	Technical issue	Evidence / significance	Recommended action
1	No agreed surface-water discharge point	The principal disposal route is not yet secured.	Obtain DCC Highways/LLFA agreement in principle before determination.
2	Storage discrepancy	433.4 m³ modelled versus 216 m³ shown on plan.	Submit consistent plan/model/storage schedule.
3	High surface-water risk in north	Potential interaction with access and existing flows.	Demonstrate accommodation through final levels and flow paths.
4	External catchment runoff	Contribution from higher land/Lynch Road not explicit.	Submit catchment and flow-path plan.
5	Shallow/artesian groundwater	Material constraint on attenuation, excavations and foundations.	Confirm design groundwater, lining, uplift and construction approach.
6	Limited source control	Current system relies strongly on downstream attenuation.	Increase distributed above-ground/non-infiltrating SuDS.
7	Exceedance routes	Some routing depends on future openings through boundaries.	Protect and detail routes in final levels/layout.
8	Maintenance/adoption	Responsibilities are divided and not all agreements are secured.	Secure clear long-term management and adoption.
9	Construction runoff	Conceptual measures provided; final arrangement not yet spatially resolved.	Approve a detailed construction surface-water plan before works.
10	Downstream hydrology	No proven unacceptable effect, but assurance remains incomplete.	Demonstrate existing-versus-proposed hydrological response.

14. Planning Implications and Recommended Actions

14.1 Matters Supporting Continued Technical Objection

The following matters are sufficiently fundamental that they should not be left wholly to post-permission detailed design:

1. A viable and agreed surface-water outfall route.
2. Reconciliation of attenuation storage between model and plan.
3. Demonstration that northern and external surface-water pathways can be safely accommodated.
4. A drainage concept sufficiently developed for the LLFA to remove or materially revise its objection.

14.2 Further Information Recommended Before Determination

1. Revised Drainage Strategy Plan consistent with the hydraulic model.
2. Revised attenuation calculations and explicit storage/freeboard schedule.
3. Written confirmation of an acceptable surface-water discharge route.
4. Existing and proposed catchment/flow-path plan.
5. Revised source-control SuDS strategy.
6. Design groundwater level and groundwater-resilience details.
7. Updated exceedance plan linked to final proposed levels.
8. Explicit treatment of the northern high-risk surface-water area.
9. Updated LLFA consultation response after review of the revised package.

14.3 Matters Potentially Suitable for Planning Conditions

- Final sizing and specification of individual SuDS components.
- Final landscaping and planting details around SuDS.
- Construction-phase surface-water management and pollution control.
- Maintenance schedules and inspection frequencies.
- Detailed anti-flotation/lining details.
- Final exceedance openings and boundary treatments.
- Land Drainage Consent where required.
- As-built drainage verification and long-term management arrangements.

14.4 Key Technical Findings/Summary of Review

To maintain technical credibility, the Parish Council should not assert without additional evidence that the development is fundamentally undrainable, that direct fluvial flooding makes the site unsuitable, that the scheme will inevitably damage downstream orchards, or that a defined large runoff contribution from the Raddon Hills definitely crosses the site. The stronger position is that the applicant has not yet demonstrated the absence of unacceptable impact in several material areas.

Table 7: Summary of Key Technical Findings.

Sn	Topic	Conclusion
1	Existing hydrology	The site has a pronounced north-to-south gradient, existing highway/land drainage, mapped surface-water risk and shallow groundwater. It is not an hydrologically isolated greenfield parcel.
2	Applicant's FRA	The FRA provides a useful baseline and a plausible drainage concept, but its conclusion that the LLFA should have no objection is not supported by the current statutory position or by unresolved internal in4consistencies.
3	Greenfield runoff	The Q_{Bar} methodology and the principle of limiting final discharge to approximately 3.7 l/s are reasonable.
4	Attenuation	The 433.4 m³ versus 216 m³ inconsistency is material and must be resolved before reliance can be placed on the model.
5	Outfall	The lack of an agreed discharge point is fundamental to drainage viability.
6	Groundwater	Infiltration is appropriately discounted, but shallow and locally artesian groundwater requires explicit design treatment.
7	SuDS	Greater distributed source control should be incorporated to better satisfy the SuDS management train and mimic natural hydrology.
8	Exceedance	The concept is acceptable, but final routes must be protected and tied to final levels and boundary design.
9	External pathways	The contribution of higher land and Lynch Road is not sufficiently explicit and should be demonstrated by a catchment/flow-path assessment.
10	Overall	The drainage strategy is potentially capable of being developed into an acceptable solution, but it is not sufficiently resolved at the present stage to justify withdrawal of the technical objection.

15. Conclusions

The review confirms that the application site has a relatively well-defined north-to-south hydraulic gradient and is influenced by a combination of existing land and highway drainage, mapped surface-water flood risk, and shallow groundwater. The site should therefore not be regarded as a hydrologically isolated greenfield parcel. Its development needs to take account not only of runoff generated within the application boundary, but also of the existing drainage pathways and the interaction between the site, Lynch Road and higher land to the north.

The applicant's Flood Risk Assessment provides a useful baseline assessment and sets out a drainage concept that is technically plausible in principle. In particular, the proposed approach of attenuating runoff and restricting discharge towards greenfield rates is appropriate. The use of the greenfield runoff methodology to derive a Q_{Bar} of approximately 2.7 l/s/ha, and the corresponding proposed final discharge rate of approximately 3.7 l/s, is considered reasonable. The principal concern is therefore not the proposed discharge rate itself, but whether the submitted drainage arrangement has been sufficiently demonstrated to deliver that rate reliably over the lifetime of the development.

A significant outstanding issue concerns the proposed attenuation storage. The drainage model identifies approximately 433.4m³ of storage within the attenuation basin, whereas the submitted Drainage Strategy Plan indicates approximately 216m³. This is a material inconsistency between the hydraulic model and the physical scheme shown on the planning drawings. Until the difference is reconciled, sufficient confidence cannot be placed on the modelled performance of the proposed drainage system, particularly for the 1% AEP design event including the climate-change allowance.

The proposed surface-water outfall is also fundamental to the viability of the drainage strategy. The scheme depends on controlled discharge through the existing and diverted highway drainage system towards the ordinary watercourse south of the site. At the time of this review, however, an agreement in principle for this discharge arrangement has not been demonstrated. Confirmation from the relevant highway authority that the proposed outfall arrangement is technically and operationally acceptable is therefore required before the drainage strategy can be regarded as secured.

Groundwater conditions represent another important design constraint. The decision not to rely on infiltration as the principal means of surface-water disposal is supported by the ground investigation, which identified shallow and variable groundwater and locally artesian conditions. However, these same conditions have implications for below-ground attenuation structures, excavation, uplift, lining, groundwater displacement, and potentially shallow subsurface flow. These matters require explicit treatment in the detailed drainage and engineering design rather than being regarded solely as an infiltration constraint.

The proposed SuDS strategy would also benefit from greater use of distributed source-control measures. At present, the system places substantial reliance on collecting runoff and managing it at downstream attenuation features. Incorporating measures such as under-drained permeable paving, rain gardens, bioretention features, tree pits, swales or other appropriate non-infiltrating source controls would better reflect the SuDS management train, improve water-quality treatment, and help reproduce the existing hydrological response of the site more closely.

The submitted exceedance strategy is acceptable in principle, and the intention to direct extreme-event flows through roads, landscaped areas and other lower-risk routes is appropriate. Nevertheless, some proposed pathways depend upon future gaps or openings through fences, hedges and walls. These routes need to be clearly incorporated into the final site levels, landscape design and boundary treatments and protected for the lifetime of the development so that their hydraulic function is not subsequently compromised.

The contribution of runoff from Lynch Road and higher land to the north and north-west also requires clearer demonstration. The available evidence does not establish that significant runoff from the wider Raddon Hills catchment necessarily passes through the site, and it would therefore be inappropriate to make that assertion without further evidence. Equally, given the mapped surface-water risk in the northern part of the site and the existing drainage relationship with Lynch Road, the contributing catchment and existing flow pathways should be explicitly defined. A catchment and flow-path assessment would provide the necessary evidence to confirm how these flows are accommodated within the proposed development.

Overall, the review finds that the proposed drainage strategy is potentially capable of being developed into an acceptable solution, and there is no basis at this stage for concluding that the site is inherently incapable of being satisfactorily drained. However, a number of material matters remain unresolved, including the attenuation-storage discrepancy, the status of the proposed outfall, groundwater-related design constraints, the need for improved source-control SuDS and clearer treatment of existing and external flow pathways.

These matters are collectively significant enough that the drainage proposals cannot yet be regarded as sufficiently resolved to justify withdrawal of the current technical objection. This conclusion is consistent with the present position of Devon County Council as Lead Local Flood Authority. Accordingly, Thorverton Parish Council is advised to maintain its hydrology and surface-water drainage objection to Planning Application 26/01201/MFUL at this stage, pending submission of the outstanding technical information, satisfactory resolution of the identified inconsistencies and subsequent confirmation from the Lead Local Flood Authority that an acceptable drainage solution has been demonstrated.

16. Recommendations to Thorverton Parish Council

16.1 Maintain the Technical Objection at Present

The Parish Council should support the current LLFA position and request that the application is not determined positively on the basis of the present drainage submission.

16.2 Request Resolution of Fundamental Matters

- Agreed surface-water outfall.
- Reconciled attenuation storage.
- Confirmed effective basin storage and freeboard.
- Expanded source-control SuDS.
- Assessment of external runoff and existing flow paths.
- Clear treatment of northern surface-water risk.
- Groundwater-resilient drainage design.

16.3 Request Further LLFA Review

Any revised drainage submission should be referred back to Devon County Council. The Parish Council should review the LLFA's updated position before finalising whether drainage concerns have been satisfactorily addressed.

16.4 Maintain Evidence-Led Wording

The objection should focus on demonstrable deficiencies and unresolved evidence rather than asserting consequences that have not been established. This approach provides a stronger technical basis for the Parish Council's planning representation.

17. Final Technical Position

Based on the information reviewed, Elite Ecology does not recommend that Thorverton Parish Council withdraw its hydrology and drainage concerns at this stage.

The proposed drainage concept is not fundamentally incapable of providing a satisfactory solution. Nevertheless, significant elements remain unresolved, and several matters identified independently through this review correspond directly with concerns raised by Devon County Council as Lead Local Flood Authority.

RECOMMENDED POSITION

The Parish Council should maintain an objection to Planning Application 26/01201/MFUL on surface-water drainage and hydrological grounds until the applicant has resolved the material outstanding matters identified by the LLFA and this independent review, and the revised information has been assessed satisfactorily by the Lead Local Flood Authority.

18. References

Applicant's Technical Submission. Flood Risk Assessment, drainage strategy, hydraulic modelling, exceedance assessment, topographical information, ground investigation, SuDS maintenance information and construction surface-water management documentation submitted in support of Planning Application 26/01201/MFUL, as detailed in Appendix A – Principal Documents Reviewed.

CIRIA (2001). *Control of Water Pollution from Construction Sites: Guidance for Consultants and Contractors, C532.* Construction Industry Research and Information Association, London.

CIRIA (2007). *Site Handbook for the Construction of SuDS, C698.* Construction Industry Research and Information Association, London.

CIRIA (2015). *The SuDS Manual, C753.* Construction Industry Research and Information Association, London. Guidance on the planning, design, construction, operation and maintenance of sustainable drainage systems.

Department for Environment, Food and Rural Affairs (Defra) (2025). *National Standards for Sustainable Drainage Systems (SuDS).* Published 19 June 2025 and updated 30 July 2025. The standards provide the current national framework for the design, operation and maintenance of surface-water drainage systems for new development in England.

Devon County Council (2023). *Sustainable Drainage Systems: Guidance for Devon.* Devon County Council, Flood and Coastal Risk Management Team. The guidance sets out the Council's requirements for surface-water management associated with major development, including SuDS design, groundwater monitoring and supporting information.

Devon County Council, Lead Local Flood Authority (7 October 2026). Consultation response to Planning Application 26/01201/MFUL, setting out the LLFA's technical assessment and outstanding surface-water drainage requirements.

Devon County Council. *Sustainable Drainage Systems (SuDS) – Flood Risk Management Guidance.* Guidance relating to Devon County Council's statutory role as Lead Local Flood Authority and its assessment of surface-water drainage proposals for major development.

Environment Agency. Flood-risk mapping and associated national flood-risk datasets, including information relating to fluvial and surface-water flood risk, where relevant to the assessment.

HR Wallingford / UK SuDS. *Greenfield Runoff Rate Estimation Tool.* Applied to the Thorverton site using the FEH Statistical methodology for estimation of existing greenfield runoff rates.

Ministry of Housing, Communities and Local Government (2026). *National Planning Policy Framework.* Published 17 August 2026 and updated 29 September 2026. In particular, Chapter 18: *Managing Flood Risk and Coastal Change (Policies F1–F9)* and Annex F: *Managing Flood Risk and Coastal Change*.

Ministry of Housing, Communities and Local Government. *Planning Practice Guidance – Flood Risk and Coastal Change.* GOV.UK. Guidance supporting the application of national planning policy in relation to flood risk, site-specific Flood Risk Assessments and sustainable drainage.

19. Appendices

Appendix A: Principal Documents Reviewed

Appendix B Recommended Further Information

Appendix C: Indicative Planning Conditions and Safeguards

Appendix A: Principal Documents Reviewed

Note: The documents listed below form part of the submitted planning application and/or statutory consultation record and are available through the Mid Devon District Council planning portal. They are **not reproduced or re-attached to this report**. This technical review should therefore be read in conjunction with these documents, which should be referred to where necessary for the detailed supporting information, drawings, calculations, and consultation comments considered in this assessment.

1. Flood Risk Assessment – Civil Studio, Project 25.096, FRA-R02, Revision 02.
2. Drainage Strategy Plan – Drawing 01.10 Rev C.
3. Overland Flood Exceedance Plan – Drawing 01.06 Rev B.
4. Surface Water Drainage Model – 25.096 SW Storage – Phase 1 – 3.7 l/s.
5. Greenfield Run-off Estimation – HR Wallingford/UKSuDS.
6. Phase 2a Preliminary Ground Investigation – GCE01409/R2v2.
7. Topographical Survey – Drawing 0846-100.
8. Highways and Site Levels Plan – Overall.
9. Drainage and SuDS Maintenance Plan – DSMP-R01.
10. Surface Water Construction Management Plan – SWMP-R01.
11. Landscape General Arrangement.
12. Devon County Council Lead Local Flood Authority response – 7 October 2026.

Appendix B: Recommended Further Information

Note: The items listed below comprise the additional or revised technical information that, in our opinion, should be provided by the applicant and/or relevant drainage authority before the outstanding surface-water drainage matters can be regarded as satisfactorily resolved. The purpose of this appendix is to clearly identify the information needed to address the principal uncertainties identified through this review. These documents are not required to be prepared by Thorverton Parish Council. Rather, they should form part of any revised or supplementary planning submission and should be reviewed by the relevant statutory consultees, particularly Devon County Council as Lead Local Flood Authority.

Table 1: Recommended Further Information Required to Resolve Outstanding Drainage Matters.

No.	Information required	Reason
1	Revised drainage plan and hydraulic model using consistent storage volumes.	To demonstrate that the modelled hydraulic performance accurately represents the physical drainage design proposed for the site.
2	Explicit attenuation basin storage and freeboard schedule.	To confirm the effective usable hydraulic capacity of the proposed attenuation basin and reconcile this with the submitted model.
3	Written agreement in principle for the proposed surface-water outfall.	To demonstrate that a technically viable and acceptable discharge route is available and can be relied upon as part of the drainage strategy.
4	Catchment and existing-flow-path plan.	To demonstrate how external runoff, existing surface-water pathways and existing drainage infrastructure interact with the development site and are to be accommodated.
5	Revised source-control SuDS strategy.	To demonstrate greater application of the SuDS management train and compliance with current national and local drainage expectations.
6	Design groundwater level, attenuation lining details and anti-flotation measures.	To demonstrate that the proposed below-ground and attenuation infrastructure can be safely constructed and operated under the identified shallow and locally artesian groundwater conditions.
7	Updated exceedance plan linked to final proposed site levels and boundary treatments.	To demonstrate that residual and exceedance flows can be routed safely without increasing flood risk to buildings, access routes or neighbouring land.
8	Updated LLFA consultation response following review of the revised information.	To confirm whether the Lead Local Flood Authority is satisfied that the outstanding drainage matters have been adequately addressed.

Appendix C: Indicative Planning Conditions and Safeguards

Note: This Appendix identifies matters that may appropriately be secured by planning condition **only after the fundamental viability of the surface-water drainage strategy has been satisfactorily demonstrated**. It is not intended to provide formal legal wording for planning conditions, nor should it be interpreted as suggesting that unresolved matters identified in **Appendix B** can simply be deferred to the detailed-design stage. The final wording, timing and enforceability of any conditions would be matters for Mid Devon District Council, having regard to the advice of Devon County Council as Lead Local Flood Authority and other relevant statutory consultees.

Table 1: Indicative Planning Conditions and Drainage Safeguards.

No.	Condition/safeguard theme	Purpose
1	Detailed surface-water drainage design	To require submission and approval of the final drainage layout, pipe network, attenuation features, flow controls and associated calculations before commencement of relevant development.
2	Maximum surface-water discharge rate	To ensure that discharge from the development does not exceed the agreed controlled rate and that the approved drainage strategy is maintained throughout the lifetime of the development.
3	Approved surface-water outfall	To ensure that the final drainage system discharges only through an agreed and technically acceptable outfall arrangement.
4	Attenuation storage and freeboard	To secure the required effective storage volume, including appropriate freeboard and allowance for climate change and urban creep.
5	Source-control SuDS	To secure the incorporation of appropriate distributed SuDS measures, such as permeable paving, rain gardens, bioretention features, swales, filter drains or other suitable measures.
6	Groundwater design and protection	To ensure that shallow groundwater conditions are properly accounted for in the design of attenuation structures, drainage infrastructure and associated earthworks.
7	Exceedance and residual-flow routing	To ensure that flows generated during extreme rainfall or drainage-system failure are directed safely away from buildings and neighbouring property and that exceedance routes remain unobstructed.
8	Construction-phase surface-water management	To require an approved construction drainage and pollution-control strategy, including measures for sediment control, temporary runoff management and protection of downstream receptors.
9	SuDS maintenance and management	To establish clear long-term ownership, inspection, maintenance and replacement responsibilities for all drainage and SuDS features.
10	Drainage adoption arrangements	To secure appropriate arrangements for adoption or long-term management of drainage infrastructure by the relevant authority, sewerage undertaker or management body.
11	As-built drainage verification	To require confirmation that the drainage system has been constructed in accordance with the approved design before occupation of the development.
12	Protection of exceedance routes and SuDS areas	To prevent subsequent landscaping, boundary treatments or private alterations from obstructing approved drainage or exceedance pathways.

These safeguards should be regarded as secondary to the pre-determination requirements identified in **Appendix B**. Fundamental matters such as the acceptability of the discharge point, reconciliation of attenuation-storage volumes and demonstration of the overall drainage strategy should first be resolved to the satisfaction of the Lead Local Flood Authority.

20. Conditions of This Report

This report has been prepared by **Elite Ecology** exclusively for **Thorverton Parish Council** in connection with the independent technical review of hydrology, flood risk and surface-water drainage matters associated with Planning Application **26/01201/MFUL** for land off Lynch Road, Thorverton, Devon. The report has been prepared in accordance with the agreed scope of services and is intended solely for the purpose stated within this document. It should not be relied upon for any other purpose without the prior written agreement of Elite Ecology.

The assessment is based on information made available at the time of preparation, including documents submitted by the applicant, statutory-consultee responses, publicly available information and other relevant technical material. While reasonable care has been taken in reviewing this information, Elite Ecology has not independently verified all third-party data and accepts no responsibility for inaccuracies, omissions or subsequent changes in information supplied by others.

This report represents an independent professional opinion based on the evidence available at the date of issue. It does not constitute a detailed drainage design, hydraulic model, ground investigation, legal opinion or approval of any proposed works. Where further investigations, detailed design, statutory approvals or agreements are recommended, these remain the responsibility of the applicant and/or relevant competent authority.

Flood-risk and drainage conditions can vary with time as a result of rainfall, groundwater conditions, maintenance, blockage, land-use change, climate change and alterations to drainage infrastructure. Accordingly, no assessment can eliminate all residual flood risk.

The findings and recommendations should be read in the context of the report as a whole. Individual sections, figures, tables or conclusions should not be considered in isolation. Elite Ecology accepts no liability to any third party who relies upon this report without its prior written consent. Any such reliance is entirely at that party’s own risk.