Appendix E

Shropshire LLFA Specific Appendix

This appendix contains supporting information to the SuDS Handbook which applies specifically to Shropshire Council. Supporting information is referenced against the relevant chapter from the SuDS Handbook.

E1 Amendments to the SuDS Handbook

Following publication of the joint SuDS Handbook by Staffordshire County Council in January 2017, please note that the following amendments now apply to Shropshire Council. The text within the sections of the SuDS Handbook referenced in sections E1.1 to E1.5 should be replaced by the text set out below (amended text is shown as **bold italic**).

E1.1. Amendment to Section 3.3.2 Soil Conditions

Disposal of surface water via infiltration to ground should be considered first when developing a SuDS design. Preliminary information on whether a site may be suitable for infiltration can be obtained from the <u>British Geological Survey (BGS) Infiltration SuDS Map</u> (chargeable data) or from LLFA specific sources listed within the relevant LLFA Appendix.

Where infiltration drainage techniques are indicated to be potentially viable, soil testing is necessary to quantify soakage rates. Guidance on undertaking these tests is available in Part H of the Building Regulations which is freely available from the <u>Gov.UK</u>. Note that where soakaways are proposed to serve areas above *100m*² the testing methodology should follow <u>BRE Digest</u> <u>365</u>.

BRE Digest 365 includes design guidance which states that soakaways should be designed for the 10% Annual Exceedance Probability event. Where a soakaway is designed to accommodate only the 10% Annual Exceedance Probability event, a developer must either:

- Undertake an exceedance flow route exercise to ensure that flows in excess of those produced by the 10% Annual Exceedance Probability event do not affect people or property, or;
- Redesign the soakaway to cater for the 1% Annual Exceedance Probability event with an allowance for 40% climate change.

At sites where infiltration is not viable, the discharge hierarchy summarised in Section 3.2 should be followed and an alternative SuDS technique used. Examples are provided in Appendix D.

My soils are very clayey; SuDS won't work.



SuDS are not excluded by your ground conditions, they merely influence the choice of SuDS.

Infiltration based SuDS are unlikely to be suitable for clay soils, however SuDS which store or convey water such as swales, ponds and wetlands can be used.

Groundwater levels on my site are very high; SuDS won't work.



SuDS are not excluded by your ground conditions, they merely influence the choice of SuDS.

The SuDS components selected should store and convey water on the surface.

Impermeable geotextile liners can be used to limit the ingress of groundwater into a SuDS feature.

E1.2 Amendment to Section 3.5.1 Key Principles

Local Standard D - Exceedance Flows

The LLFA will expect exceedance flows, originating from both within and outside of the development site, must be directed through areas where the risks to both people and property are minimised.

It should be demonstrated that exceedance flows up to the 1% Annual Exceedance Probability (AEP) plus climate change will not result in the surface water flooding of more vulnerable areas within the development site or contribute to surface water flooding of any area outside of the development site.

Exceedance flow paths should be provided to ensure that any such flows are managed on site. The discharge of any such flows across the adjacent land would not be permitted and would mean that the surface water drainage system is not being used.

When considering exceedance routes, particular attention should be paid to:

- i. The position of walls, bunds and other obstructions that may direct water but must not cause ponding.
- ii. The location and form of buildings (e.g. terraces and linked detached properties) that must not impede flows or cause ponding.
- iii. The finished floor levels relative to surrounding ground.

Submitted drawings and calculations must identify sources of water entering a site pre development, how flows will be routed through a site, where flows leave the site pre development and where they leave the site post development.

E1.3 Amendment to Section 3.5.2 Climate Change and Urban Creep

Local Standard E – Climate Change

The LLFA will expect SuDS design to include an allowance for **a 40%** increase in rainfall for a 1% AEP rainfall event in order to accommodate climate change. (*note that guidance may be subject to change and therefore the most up to date information should be referenced)

E1.4 Amendment to Section 3.5.5 Land Take

Adopting green roofs and rainwater harvesting allows rainwater to be controlled as close to source as possible, attenuating the flow of runoff and providing other benefits. Although rainwater harvesting is to be encouraged, note that it cannot be taken into account when sizing an attenuation system as the storage facility may be full when a storm event occurs. Details of an overflow from the harvesting system to the soakaway/attenuation should be submitted for approval. Permeable paving or other permeable surfaces can replace standard impermeable tarmac to reduce the amount of runoff generated. However, if non permeable surfacing is used on the driveways and parking areas and the driveways slope towards the highway, the applicant should submit for approval a drainage system to intercept water prior to flowing on to the public highway. Bioretention areas can be used as landscaped features in car parks, and in areas where green space would be expected anyway.

E1.5 New Local Standard P - Disposal of Foul Water

New Local Standard P - Disposal of Foul Water

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.

If main foul sewer is not available for connection, full details and sizing of the proposed septic tank/ package sewage treatment plant including percolation tests for the drainage field soakaways should be submitted for approval including the Foul Drainage Assessment Form (FDA1 Form). British Water 'Flows and Loads: 4' should be used to determine the number of persons for the proposed development and the sizing of the septic tank/ package sewage treatment plant and drainage fields should be designed to cater for correct number of persons and in accordance with the Building Regulations H2. These documents should also be used if other form of treatment on site is proposed

E2 Overview

E2.1 Local Governance

Shropshire Council is a Unitary Authority with combined county and district council powers. The council's remit is to assess all planning applications for development within its unitary boundary.

E2.2 SuDS Delivery Partners

The Water and Sewerage Company serving the majority of Shropshire is <u>Severn Trent Water</u> <u>Limited</u>.

A small area of Shropshire along its northern border with Wrexham County Borough Council, is served by Dwr Cymru Welsh Water. A small part of north eastern Shropshire is covered by United Utilities



Figure E2-1 Water and Sewerage Company Boundaries on the Northern Edge of Shropshire. Remainder of Shropshire not shown is within Severn Trent Area (*Contains OS data* © *Crown copyright [and database right] (2017)*).

E3 The Planning Process

E3.1 Planning Process and Timescales

E3.1.1 Pre-application Discussion

In order ensure that development proposals are sustainable and well planned, and that all the required information is submitted, Shropshire Council strongly encourages all developers to engage in pre-application discussions via the <u>pre-application process</u>. Developers should submit a <u>Pre-application Advice Form</u> in order to receive consistent and reliable advice relevant to the site in question. Further in depth discussions may be required in addition to the standard pre-application discussions and these should be agreed separately with Shropshire Council.

Information on standards of service can also be found on the Shropshire Council website.

E3.1.2 How to Submit Your Application

The Surface Water Drainage Proforma for Category A and B applications included as Appendix A and supporting evidence must be submitted for all major developments (Appendix E2). For all minor developments the Surface Water Drainage Proforma for Category C and D applications (Appendix E1) should be submitted together with supporting evidence.

Standing Advice is applicable for commercial and residential developments up to 1 hectare in low flood risk areas.

Low flood risk areas are classed as those which are:

- Outside of Flood Zones 2 and 3:
- Not within an area at risk of pluvial flooding as shown by the Environment Agency Flood Map for Surface Water;
- More than 20m away from either bank of an unmodeled watercourse; or
- Within an urban area.

The information will still need to be submitted to the Local Planning Authority who will apply the Standing Advice when making their decision.

Standing Advice for Minor developments in Areas of Low Flood Risk

A sustainable drainage scheme for the disposal of surface water from the development should be designed and constructed in accordance with The Surface Water Drainage Proforma for Category C and D applications (Appendix E1).

The provisions of the <u>National Planning Policy Framework (NPPF) Section 10 'Meeting the challenge of climate change, flooding and coastal change'</u> should be followed.

Preference should be given to drainage measures which allow rainwater to soak away naturally. Connection of new surface water drainage systems to existing drains / sewers should only be undertaken as a last resort, if it can be demonstrated that infiltration techniques are not achievable.

If non permeable surfacing is used on the driveways and parking areas and the driveways slope towards the highway, the applicant should install a drainage system to intercept water prior to flowing on to the public highway.

If main foul sewer is not available for connection, <u>British Water 'Flows and Loads: 4</u> should be used to determine the number of persons for the proposed development and the sizing of the septic tank or package treatment plant and drainage fields should be designed to cater for the correct number of persons and in accordance with the <u>Building Regulations H2</u>.

E3.1.3 Liaison with Third Parties

As part of the planning process, Shropshire Council will consult, as necessary the following statutory and non-statutory consultees:

- Water and Sewerage Companies (<u>Severn Trent Water</u>, <u>Dwr Cymru Welsh Water</u> or <u>United Utilities</u>) if the proposed SuDS interacts with the public sewer system.
- Environment Agency if the proposed SuDS will discharge directly to a watercourse classed as 'Main River', is within Flood Zones 2 or 3 or is within locally identified sensitive catchments (see Section E4.3).
- <u>Shropshire Highway Authority</u> or <u>Highways England</u> if the proposed SuDS is likely to impact on existing road drainage.
- <u>Canal & River Trust</u> if the proposed SuDS will discharge directly or indirectly to a <u>Canal</u> & River Trust owned waterway.
- Rea Internal Drainage Board or Melverley Internal Drainage Board if the SuDS will discharge directly or indirectly to a watercourse managed by either IDB.
- Local authority colleagues, such as those providing environmental, health and safety and emergency planning advice, as appropriate.

E3.2 Relevant Planning Policies

As a Unitary Authority, Shropshire Council oversee all planning policy in the county. The following policies, strategies and guidance provide the legislative support for the promotion and use of SuDS on all development sites in Shropshire.

- Shropshire Core Strategy 2006 2026 Policy CS18
- Shropshire Site Allocations and Management of Development (SAMDEV) Policy MD2

A Supplementary Planning Document (SPD) focussed on Water Management is currently in development which will make reference to the guidance set out within the SuDS Handbook. Once complete, this SPD will also be used by Shropshire Council when making decisions on planning applications.

E3.3 Technical Review of SuDS Submission

The SuDS strategy and any supporting documents as listed in Appendix A, including a completed Appendix A shall be submitted as part of the planning application. Shropshire Council's Flood and Water Management Team will assess the drainage proposal, acting as a consultee to the Planning Department and will provide comments regarding the application. The response shall include advice whether further documentation is required prior to determination of the application or whether the strategy can be finalised by way of planning conditions.

Engineering designs for drainage systems that take surface water flow from a highway will be checked by the Flood and Water Management Team at Shropshire Council to ensure they comply with the necessary highway standards. These checks will usually be carried out after the planning application stage but prior to adoption of roads where this is proposed. However, where a developer is proposing that the Council will adopt SuDS (taking highway runoff only), this should be discussed at planning application stage as a S106 planning contribution or commuted sum is likely to be required. Further details on adoption of SuDS are provided in Section E2.5.

The engineering design assessments are in addition to the design checks carried out by the Shropshire Council Flood and Water Management Team which assess the ability of a SuDS system to manage surface water flows from a development site as a whole.

E3.4 Arrangements for Maintenance and Adoption of SuDS

Options for the maintenance of SuDS within Shropshire are set out in Table C2-1 below. Although not exhaustive, these lists present what Shropshire Council considers to be the most likely arrangements for ensuring long term maintenance.

An appropriate level of information should be submitted with a planning application with regard to evidence of discussions with a proposed future maintenance provider. Where Pre-Application advice has been provided, Planning Obligations (draft Heads of Terms) may set out maintenance requirements and are applicable at outline application stage. At later stages more detail will be required.

Highway Adoption and Gullies

Shropshire Council as the Highway Authority will only adopt SuDS which manage surface water arising from a public highway and, where this is the case, a commuted sum for maintenance will likely be required. Any SuDS feature taking roof and drive (private) drainage should not connect to the public highway drainage system. The following requirements must be adhered to.

Where a highway is to be adopted and gullies will be the only means of removing surface water from the highway, footpaths and paved areas falling towards the carriageway, spacing calculations will be based on a storm intensity of 50mm/hr with flow width of 0.75m and be in accordance with DMRB CD526 Spacing of Road Gullies (formerly HA102).

Gully spacing calculations must also be checked in vulnerable areas of the development for 1% AEP plus climate change 15 minute storm events. Storm water flows must be managed or attenuated on site, ensuring that terminal gullies remain 95% efficient with an increased flow

width. The provision of a finished road level contoured plan showing the proposed management of any exceedance flows should be provided.

Vulnerable areas of the development are classed by Shropshire Council as areas where exceedance flows are likely to result in the flooding of property or contribute to flooding outside of the development site. For example, vulnerable areas may occur where a sag curve in the carriageway vertical alignment coincides with lower property threshold levels or where ground within the development slopes beyond the development boundary.

Local Standard D of the SUDS Handbook (amended in Appendix E1.2) requires that exceedance flows for events up to and including the 1% AEP plus CC should not result in the surface water flooding of more vulnerable areas (as defined above) within the development site or contribute to surface water flooding of any area outside of the development site.

Permeable Paving

Although permeable paving should be considered as part of the drainage design on any new development, Shropshire Council are not currently willing to accept permeable paving on any section of highway put forward for adoption. The adoption of permeable paving as part of the adoptable public highway could provide significant water quality benefits and reduce the land take associated with site wide SuDS systems due to the treatment and storage of highway runoff in the pavement. Shropshire Council may consider adopting permeable paving in the future on minor low traffic estate roads The Drainage and Flood Risk Team should be contacted early in the design process if permeable paving is to be considered for adoption. Reference should be made to Interpave's Design & Construction of Concrete Block Permeable Paving guidance for all permeable paving proposals.

Water and Sewerage Companies

Both Severn Trent Water and United Utilities are currently developing their SuDS guidance. Until this becomes available <u>Severn Trent Water Limited</u> and <u>United Utilities</u> should be contacted directly for any discussions regarding SuDS.

Dwr Cymru Welsh Water should also be contacted early in the design process regarding the adoption of SUDS.

Rea and Melverley Internal Drainage Boards

The Rea and Melverley Internal Drainage Boards will consider the adoption, for maintenance purposes, of SuDS such as swales and attenuation ponds which are within, or impact on, their drainage district. This may present developers with a further opportunity to manage surface water run-off from their sites, however this would be subject to legal agreement.

Town / Parish Councils

If a SuDS feature lies within or contributes to Public Open Space, the relevant Town or Parish Council may consider maintaining the feature. However, it would be dependent on the provision of consistent, reliable funding for any necessary maintenance activities supported by relevant agreements.

Shropshire Wildlife Trust

Shropshire Wildlife trust may take on the responsibility for a SuDS feature which has significant biodiversity interest or is adjacent to an existing wildlife site. As above, guaranteed, regular funding would be required.

What SuDS Features are Included in the SuDS Scheme?	Who May Consider Maintaining the SuDS Scheme?	In What Circumstances Would They Consider This?	Who do I need to Contact?
Source Control: Permeable Surfaces	Property Owners (Commercial / Residential)	Owners of a property drained by SuDS which do not also drain any other properties Where a SuDS feature is within the private curtilage of a property Where a group of properties benefit from a SuDS which is simple to maintain, a group of owners could agree to maintain the system collectively	Future Property Owners To Be Made Aware
	Shropshire Council Highway Authority	Discrete areas of permeable block paving or other permeable surfacing may be considered for adoption by the Highway Authority through the Section 38 process. Developers wishing to explore the use of pervious surfacing on adoptable highways must engage with the Highway Authority at an early stage to agree site-specific requirements.	Shropshire Council
		Developers are encouraged to use pervious surfaces on highway areas that are to remain private, such as shared driveways, private driveways, paths, patios and other hard standings. The maintenance of pervious surfaces on privately owned areas would fall to the land owner(s).	Highway Authority
Source Control: Green Roofs / Rainwater Harvesting	Property Owners (Commercial / Residential)	Owners of a property drained by SuDS which do not also drain any other properties Where a SuDS feature is within the private curtilage of a property	Future Property Owners To Be Made Aware
	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
Source or Site Control: Soakaways / Infiltration Trenches	Property Owners (Commercial / Residential)	Owners of a property drained by SuDS which do not also drain any other properties Where a SuDS feature is within the private curtilage of a property	Future Property Owners To Be Made Aware
	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
	Shropshire Council Highway Authority	Soakaways that accept water from adoptable highway only may be considered for adoption by the council as the Highway Authority through the Section 38 (Highways Act 1980) process. Developers wishing to explore this option further must engage with the Highway Authority at an early stage to agree the site-specific requirements. Infiltration trenches will be reviewed on a case by case basis. Soakaways should have a minimum of a 5m offset from the carriageway.	Shropshire Council Highway Authority

What SuDS Features are Included in the SuDS Scheme?	Who May Consider Maintaining the SuDS Scheme?	In What Circumstances Would They Consider This?	Who do I need to Contact?
Site Control: Swales / Channels / Rills / Filter Strips / Rain Gardens	Shropshire Council Highway Authority	Swales, channels, rills, filter strips and rain gardens that accept water from an adoptable highway only may be considered for adoption by the Council as the Highway Authority through the Section 38 (Highways Act 1980) process. Developers wishing to explore this option further must engage with the Highway Authority at an early stage to agree the site-specific requirements including the payment of commuted sums.	Shropshire Council Highway Authority
	Town / Parish Council	If the SuDS feature lies within or contributes to Public Open Space	Relevant Town / Parish Council
	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
	Rea Internal Drainage Board / Melverley Internal Drainage Board	Where SuDS are within or impact on the drainage district	Rea Internal Drainage Board or Melverley Internal Drainage Board
	Conservation Groups	For example, a Local Wildlife trust may take on the responsibility for a SuDS feature which has significant biodiversity interest or is adjacent to an existing wildlife site	Shropshire Wildlife Trust
Site or Regional Control: Bio retention Areas / Infiltration or Detention Basins / Retention Ponds	Town / Parish Council	If the SuDS feature lies within or contributes to Public Open Space	Relevant Town / Parish Council
	Rea Internal Drainage Board / Melverley Internal Drainage Board	Where SuDS are within or impact on the drainage district	Rea Internal Drainage Board or Melverley Internal Drainage Board
	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
	Shropshire Council Highway Authority	Bio retention areas, infiltration basins, detention basins and retention ponds that accept water from adoptable highways only may be considered for adoption by the Highway Authority under a suitable Section 38 agreement. Developers wishing to explore this option further must engage with the Highway Authority at an early stage to agree the site-specific requirements.	Shropshire Council Highway Authority
	Conservation Groups	For example, a Local Wildlife trust may take on the responsibility for a SuDS feature which has significant biodiversity interest or is adjacent to an existing wildlife site.	Shropshire Wildlife Trust

What SuDS Features are Included in the SuDS Scheme?	Who May Consider Maintaining the SuDS Scheme?	In What Circumstances Would They Consider This?	Who do I need to Contact?
	Town / Parish Council	If the SuDS feature lies within or contributes to Public Open Space	Relevant Town / Parish Council
Regional Control: Wetlands	Rea Internal Drainage Board / Melverley Internal Drainage Board	Where SuDS are within or impact on the drainage district	Rea Internal Drainage Board or Melverley Internal Drainage Board
	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
	Conservation Groups	For example, a Local Wildlife trust may take on the responsibility for a SuDS feature which has significant biodiversity interest or is adjacent to an existing wildlife site.	Shropshire Wildlife Trust
Source, Site or Regional Control: Geocellular Storage	Service Management Company	Where a Management company has been set up to manage public spaces on new developments	
Source, Site or Regional Control: Oversized Pipes	Shropshire Council Highway Authority	Highway Development Control should be consulted on the location of oversized pipes under the highway as they may object to if adopting the highway above.	
Flow Control Systems: Inlets / Outlets / Vortex	Service Management Company	Where a Management company has been set up to manage public spaces on new developments. Note that if the flow control system includes oversized pipes, these may not be placed under the public highway.	
	Shropshire Council Highway Authority	The Council may adopt these as Highway Authority where the system is purely taking highway water; a commuted sum will be required.	Shropshire Council Highway Authority
	Town / Parish Council	If the system maintenance requirements are non-specialist and the system lies within or	Relevant Town / Parish Council
	Conservation Groups	contributes to Public Open Space	Shropshire Wildlife Trust

Table E3-1 Maintenance Options

Table E3-2 provides a list of the issues that should be considered, and the subsequent actions required to engage with a particular authority or organisation for adoption and maintenance.

Authority or Organisation	Issues to Consider	How to Set Up Authority / Organisation as SuDS Maintainer
Property Owners (Commercial / Residential)	Ensure that suitable, legally binding agreements are put in place. Provision of information on maintenance requirements to property owners Highlight the importance of maintenance and emphasise that property owners may be liable / may suffer detrimental consequences in future for system failure if they don't maintain it. Plan for succession and continuity where owners / occupiers change Educate individuals as to the operation and maintenance of the SuDS. Consider the possible impacts of changes in or changes arising from permitted development rights increasing runoff to SuDS system and reduce standard of service. Put in place a process to mitigate for this. SuDS features serving single properties may be designated under the Flood and Water Management Act 2010	Determine what maintenance activities would be required Engage services of a conveyancing solicitor to advise new homeowners / set out in the property deeds Confirm who will monitor the maintenance and sanction where requirements are not met
Service Management Company	Include for the potential future increases in maintenance costs Set out what information should be provided by the Service Management Company to Shropshire Council and the timescales within which this should be provided. Put in place processes to ensure that householders / occupiers do not default on payments. Set out how any debts will be recovered Ensure that the Service management Company is sufficiently trained and resourced and that the LPA understands how and when to take enforcement action. An appropriate legal agreement should be put in place when responsibility is handed over from the developer to the Service Management Company to ensure the Service Management Company is liable for any failure to maintain the SuDS in future. Set up a framework for monitoring the maintenance activities of the Service Management Company. Put in place safeguards to ensure long term maintenance should the Service Management Company go bankrupt or dissolve Any fee agreement between householders / occupiers must be binding	A site specific Service Management Company needs to be set up or an existing organisation needs to take on the role of a Service Management Company Determine what maintenance activities would be required Assess the equivalent annual costs per property of carrying out this maintenance. Engage services of a conveyancing solicitor to advise new homeowners / set out in the property deeds Confirm who will monitor the maintenance and sanction where requirements are not met

Authority or Organisation	Issues to Consider	How to Set Up Authority / Organisation as SuDS Maintainer
Shropshire Council Highway Authority	Need for detailed discussions with adopting authority before a maintenance arrangement will be agreed. Detailed design to be agreed and a Section 106 agreement signed to ensure council is not open to liability from system failure. A S38 agreement (Highways Act1980) is legally binding and therefore will need to be set up appropriately. A one off payment on adoption would be usual as opposed to an annual one that future homeowners would be liable for.	Contact Shropshire Council Highway Authority.
Town / Parish Council	Ensure that the Town / Parish Council has the knowledge to maintain the SuDS for the lifetime of the development. Town / Parish Councils are likely to request funding for whole life maintenance of the SuDS.	Draw up an indicative maintenance plan including anticipated costs Contact the Town / Parish Council to discuss the proposals Engage the services of a legal professional to draw up an agreement which will ensure the maintenance activities are carried out. Agreement to be obtained regarding payment processes. Model agreements are provided in Appendix B9 of the CIRIA SuDS Manual.
Rea Internal Drainage Board / Melverley Internal Drainage Board	Detailed review of design proposals required to ensure IDB is not open to liability from system failure. Need for detailed discussions with adopting authority before a maintenance arrangement will be agreed. A legal agreement will need to be put in place for any future maintenance commitments.	Contact Rea Internal Drainage Board / Melverley Internal Drainage Board
Water and Sewerage Company (Severn Trent Water Limited, Dwr Cymru Welsh Water or United Utilities)	Features potentially eligible for adoption are limited and subject to detailed conditions. Detailed review of design proposals required to ensure Water and Sewerage Company is not open to liability from system failure. Maintenance costs funded through surface water drainage component of household water bills would subject to OfWat regulation. If acting as a Service Management Company, then charges would not be regulated by OfWat. Individual Water and Sewerage Company policy and guidance on SuDS would need to be taken into account during SuDS design e.g. on design events, SuDS types, construction details etc.	Contact your relevant Water and Sewerage Company (Severn Trent Water, Dwr Cymru Welsh Water or United Utilities)

Authority or Organisation	Issues to Consider	How to Set Up Authority / Organisation as SuDS Maintainer
Conservation Groups	If a SuDS feature is colonised by a protected species, the feature and its environs may be designated accordingly. This may impact on the maintenance programme. Conservation Groups are likely to request funding for whole life maintenance of SuDS.	Contact Shropshire Wildlife Trust

Table E3-2 Issues for Adoption and Maintenance

An example Maintenance Plan is included in Appendix B of the CIRIA SuDS Manual.

E3.5 Other Consents which may be required Outside of the Planning Process

In addition to the consents listed in Chapter 2.6 of the SuDS Handbook, the following are specific to Shropshire.

Water and Sewerage Companies

If your development site is located within the area where Severn Trent Water Limited provide sewerage services, information on Section 104 and Section 106 agreements can be found on their webpage, "I'm Developing a New Site", along with other more general information for developers.

Information for Developers within the Dwr Cymru Welsh Water area can be found on their <u>Developer Services</u> web pages.

Information for Developers within the United Utilities area can be found on their <u>Pre-development</u> web pages.

Shropshire Hills Area of Outstanding Natural Beauty

Great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONB), which have the highest status of protection in this regard. The Shropshire Hills AONB is located within Shropshire (Figure E3-5). Any development within the AONB should be in accordance with the Shropshire Hills AONB Management Plan.

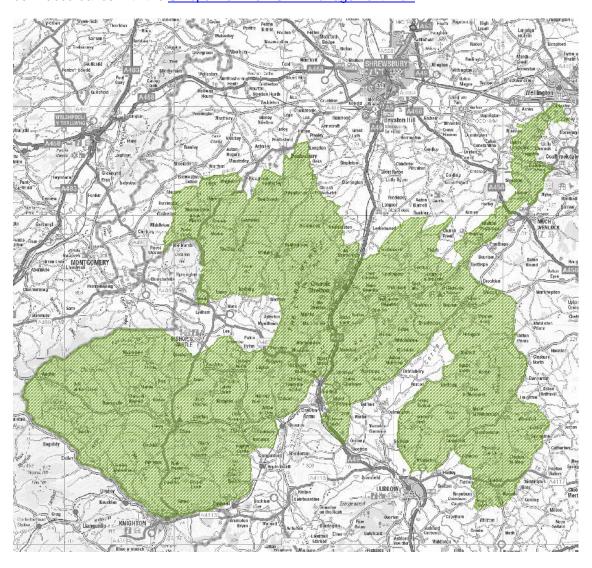


Figure E3-1 Shropshire Hills AONB (Contains OS data © Crown copyright [and database right] (2017))

River Clun Special Area of Conservation

The River Clun upstream of Leintwardine on the Herefordshire border is designated as a Special Area of Conservation (SAC). Diffuse pollution is a key issue for this site and actions to mitigate this are set out in the River Clun Restoration Strategy. Siltation and water pollution are highlighted as priority issues in the Site Improvement Plan. Sites where surface water discharge will ultimately end up in the River Clun must ensure that the SuDS design meets the required water quality standards. Figure E3-2 shows the hydrological extent of the River Clun catchment within Shropshire. Also see section E4.5.2. for special requirements in the Clun catchment.

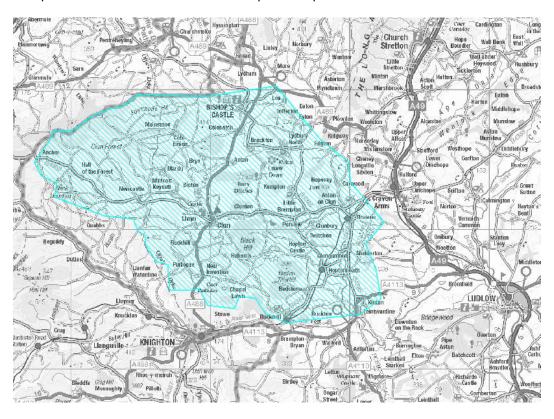


Figure E3-2 River Clun Catchment (Contains OS data © Crown copyright [and database right] (2017))

North Shropshire Meres and Mosses

The meres and mosses are a wetland of international importance. While only a fragment of their former size, they are still home to many plants and insects that are rarely found elsewhere. The Wildlife Trusts are working with other organisations across the region to restore this fragmented wetland.

Highways

Shropshire Council have powers under the Highways Act to enforce against deposits on the highway which constitute a nuisance such as water or silt. As a rule, Shropshire Council does not allow connections into a highway drain. In exceptional circumstances, connections may be consented. In addition, permission to work within the highway must also be sought from the council.

E4 SuDS Design Guidance

E4.1 Establishment of Environmental Assets and Constraints

E4.1.1 Soil Conditions

Disposal of surface water via infiltration to ground should be the first choice for consideration when developing a SuDS design. Preliminary information on the type of SuDS which may be applicable across the county can be found on the SuDS Applicability map available on the <a href="https://shropshire.council.com/Shrops

Information on SuDS suitability can also be found in the <u>Shropshire Strategic Flood Risk Assessment</u>; however, please note that over time new information becomes available that may not have been taken into account when these documents were prepared.

These sources of information should be used as outline guidance with the actual suitability determined by site investigation and testing.

E4.2 Design Criteria

E4.2.1 Key Principles

Peak runoff rates specified by the LLFA will take precedent over the discharge rate set by Severn Trent Water Limited, Dwr Cymru Welsh Water or United Utilities as long as the rate set by the LLFA is more restrictive.

E4.3 Flood Risk

E4.3.1 Watercourses

The catchments of the Wesley Brook (Shifnal), the Shylte Brook (Much Wenlock), Afon Tanat / Cynllaith (Llanyblodwell), River Corve (Corvedale) have been identified as particularly sensitive to increases in surface water runoff. If your development falls within one of these catchments, please contact Shropshire Council to discuss the surface water drainage requirements. Figures E4-1 and E4-2 show the approximate locations of these catchments.



Figure E4-1 Catchments Sensitive to Increases in Surface Water Runoff: Wesley Brook (Contains OS data © Crown copyright [and database right] (2017))



Figure E4-2 Catchments Sensitive to Increases in Surface Water Runoff: Shylte Brook (Contains OS data © Crown copyright [and database right] (2016))

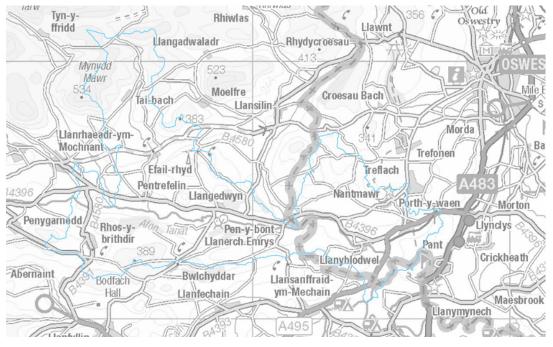


Figure E4-3 Catchments Sensitive to Increases in Surface Water Runoff: Llanyblodwell (Contains OS data © Crown copyright [and database right] (2016))

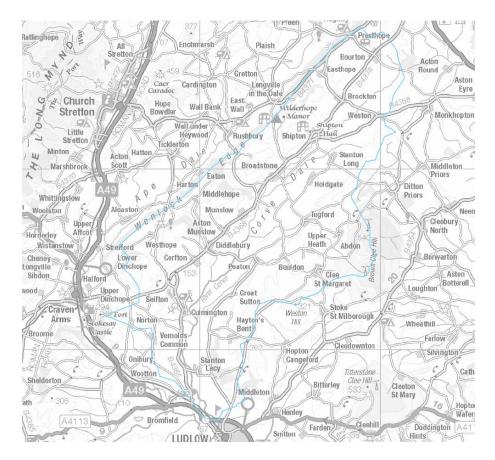


Figure E4-4 Catchments Sensitive to Increases in Surface Water Runoff: Corvedale (Contains OS data © Crown copyright [and database right] (2016))

E4.3.2 Surface Water Data

The <u>Environment Agency's Updated Flood Map for Surface Water</u> (uFMfSW) is the most relevant source of surface water flood mapping for the majority of the County. If your site is within one of the settlements listed below, more detailed mapping may be available.

Additional detailed information regarding surface water flood risk for six settlements within the county is available by following the links below:

- Shifnal Surface Water Management Plan
- Church Stretton Surface Water Management Plan
- Craven Arms Surface Water Management Plan
- Oswestry Surface Water Management Plan
- Much Wenlock Integrated Urban Drainage Management Plan
- Shrewsbury Surface Water Management Plan

E4.3.3 Groundwater Data

On site testing should be used to determine the water table; testing should ensure that due account is taken of any seasonal variation.

E4.4 Historic Environment

A database of the archaeological sites and monuments, historic buildings and historic landscapes is available on the website of Shropshire's Historic Environment Record.

<u>Historic England</u> provides advice regarding Scheduled Monuments, Grade I and II* Listed Buildings, Grade I Registered Parks and Gardens and Registered Battlefields.

E4.5 Delivering Multiple Benefits

E4.5.1 Wildlife and Biodiversity

Proposed SuDS should be informed by an ecological survey and assessment in line with Shropshire Council's Core Strategy Policy CS17.

Useful sources of information about local wildlife are:

- Shropshire County Biodiversity Action Plan
- Shropshire Ecological Data Network

Development within the River Clun catchment (Figure E2-8) must take into account the requirements to meet the conservation of the River Clun SAC. SuDS will provide a valuable method of improving the quality of surface water runoff from new development.

E4.5.2 Special Requirements In River Clun Catchment

In line with Shropshire Council's Ecology team's guidance relating to development within the Clun Catchment, discharge from a package treatment plant (PTP) to a watercourse is not permitted. The only allowable method to discharge foul effluent is via a PTP or septic tank to a drainage field is accordance with the following parameters:

- Discharges are to ground and are less than 2m³/day.
- The drainage field is more than 50m from the River Clun Special Area of Conservation boundary.
- The drainage field will not be subject to significant flooding, e.g. it is not in Flood Zone 2 or 3.
- There are no other known factors which would expedite the transport of phosphorus for example fissured geology, insufficient soil below the drainage pipes, known sewer flooding, conditions in the soil/geology that would cause re-mobilisation of phosphorus, presence of mineshafts, etc.
- The discharge to ground is at least 200m from any other discharge to ground.
- A percolation test has been performed of the proposed location of the drainage field with the resulting value lying within the required range under the Building Regulations 2010.
- Additionally, all of the following criteria must also be met:
 - The drainage field is more than 40m from any surface water feature e.g. ditch, drain, watercourse.

- o The drainage field is in an area with a slope no greater than 15%.
- The drainage field is in an area where the high water table groundwater depth is at least 2m below the surface at all times.

A completed FDA1 form, providing full calculations, together with an accurate, annotated drawing and location plan for the soakaway/drainage field should also be submitted as part of the planning application. The drawing should state the make, model and capacity of the proposed package treatment plant/septic tank

E4.5.3 Public Open Space and Amenity

Shropshire Council set out its Public Open Space requirements in its <u>Site Allocations and Management of Development (SAMDev) Plan, Policy MD2.</u>

E4.5.4 Landscape

Mapping of the character types within Shropshire can be found on the <u>Shropshire Council Environment</u> web pages.

Reference should also be made to emerging local design and development guides as well as any relevant Supplementary Planning Documents (SPD).

E4.6 Water Quality and the Water Framework Directive

Shropshire is predominantly within the River Severn River Basin District. A small area along the north and west boundary is covered by the River Dee River Basin District (Figure E4-5).



Figure E4-5 River Basin Districts in Shropshire

River Severn River Basin Management Plan

The four catchments within the Severn River Basin Management Plan of relevance to Shropshire are:

- Severn Uplands
- Shropshire Middle Severn
- Teme
- Wye

The Severn River Basin Management Plan highlights diffuse pollution from urban sources as a key issue in all catchments within the river basin and emphasises the need to minimise the risk of pollutants from new developments entering watercourses throughout the river basin. Objectives relevant to the inclusion of SuDS within a development are:

- Promote the wide scale use of SuDS and provide guidance for integrating development and water planning.
- Follow the <u>SuDS Interim Code of Practice</u> and comply with published advice for operators.

River Dee River Basin Management Plan

The northern edge of Shropshire (Chirk to Whitchurch) lies within the River Dee catchment. The two catchments within the Dee River Basin Management Plan of relevance to Shropshire are:

- Upper Dee (Chirk)
- Middle Dee (Whitchurch)

Diffuse urban pollution is highlighted as an issue particularly within the Middle Dee. Objectives relevant to the inclusion of SuDS within a development are:

- Promote the wide scale use of SuDS and provide guidance for integrating development and water planning.
- Follow the <u>SuDS Interim Code of Practice</u> and comply with published advice for operators.
- Promote the use of SuDS in new urban and rural development where appropriate and retrofit in priority areas including highways where possible.

E4.7 Culverted Watercourses

Policy 6 of the Shropshire and Staffordshire Local Flood Risk Management Strategy notes that the Council will, generally, be opposed to the culverting of watercourses and the construction of in channel structures unless there is no reasonable alternative, e.g. where a new road or railway embankment is to cross a watercourse, the use of a culvert may be approved.

Where there are proposals to culvert a section of watercourse, Ordinary Watercourse Consent or an EA permit will be required. Further information can be found on the Shropshire Council website: New development and watercourse consenting.

E4.8 Useful Resources and References

Shropshire Council Flood and Water Management

Shropshire Roads and Highways

Shropshire Surface Water Management Plans

CIRIA SuDS Handbook

United Utilities SuDS

National Planning Policy Guidance

E4.9 SUDS Design Guidance

In addition to that specified within the SuDS Handbook the following design criteria be considered prior to designing and SuDS system in Shropshire:

E4.9.1 SuDS Technical Design Guidance

All SuDS brought forward on developments in Shropshire should be designed and installed in line with the most up to date version of the CIRIA SuDS Manual. Any deviation from this design document must be agreed in writing with the LLFA.

E4.9.2 Rates of Discharge

Shropshire Council have adopted the policies set out in the National Standards S2 and S4 for peak flow and volume control from greenfield sites. Runoff rates specified by the LLFA will take precedent over the discharge rate set by STW as long as the rate set by the LLFA is more restrictive.

E4.9.3 Brownfield Peak Flow and Volume Control

As set out in policies S3 and S5 of the SuDS National Standards, the peak runoff and volume rates from any brownfield site must be restricted to as close as reasonably practicable to the greenfield runoff rate and should never exceed the rate of discharge from the site prior to redevelopment. National Policy S6 also states that where this is not "reasonably practicable", the runoff volume must be discharged at a rate that does not adversely affect flood risk.

For any brownfield development in Shropshire where a developer wishes to exceed the greenfield rate for both flow and volume control the developer must provide a viability assessment to prove that the greenfield rate is not achievable. In cases where Shropshire Council permit the developer to deviate from greenfield rates, an upper limit of a **50% betterment** on the existing rates of flow and volume produced by the site must be provided. In some cases, where development is located in an area of known fluvial or pluvial flood risk, Shropshire Council reserve the right to place additional runoff and volume restrictions on brownfield sites.

Note that as a supplementary requirement to National Standards S5 and S3, the following statement applies. For any brownfield development in Shropshire where a developer wishes to exceed the greenfield rate for both flow and volume control the developer must provide a Viability Assessment to prove that the greenfield rate is not achievable. In cases where Shropshire Council permit the developer to deviate from greenfield rates, an upper limit of a 50% betterment on the existing rates of flow and volume produced by the site must be provided.

E4.9.4 Climate Change Allowance

The potential impacts of climate change on future rainfall and peak river flows are set out in the Flood Risk Assessments: Climate Change Allowances guidance document published by the EA. Whilst the guidance document sets allowances at a river basin, each LLFA is able set their own levels to better reflect their local circumstances. Shropshire Council is located within the Severn River Basin.

E4.9.5 Peak River Flows

In situations where the risk of fluvial flooding at a site requires assessment or where river levels at a, Shropshire Council follow the <u>processes set out by the EA</u>. When developing any site where river modelling is required or requested by the LLFA, for example when setting drainage outfall levels, the LLFA should be contacted at the earliest opportunity to agree a suitable climate change allowance.

E4.9.6 Peak River Flows

The following increases in peak rainfall should be applied to the design of drainage systems serving new development in Shropshire, inclusive of those which include systems reliant on infiltration.

- Entirely residential: 40% (upper end allowance with a development lifetime of around 100 years)
- Mixed use residential and commercial where the commercial and residential units drain to a shared system or outfall: 40%
- Commercial: 20% (upper end allowance with a development lifetime of around 50 years)

E5.0 Network Modelling Software Requirements

As part of any detailed drainage design, the submission of a modelled drainage network will be required. In order for Shropshire Council to be able to fully assess the design this should be submitted in MicroDrainage (.mdx) format.

Should a development require the modelling of a watercourse or other feature, the modelling parameters should be discussed with the Drainage and Flood Risk Team prior to commencement.

The following MicroDrainage modelling parameters should be applied to any design. Any changes to these values must be agreed with the LLFA prior to submission:

E5.1 Design Criteria

UK Rainfall: The rainfall data used in any MicroDrainage model submission should be based on the most up to date FEH data available (currently FEH2013). FEH rainfall data for any site can be acquired though The Centre for Ecology and Hydrology website. **The M5 2min for Shropshire must be 3.5mm.**

Where FEH tools are not available, IH124 for small catchments will be considered as an alternative method.

Maximum Rainfall: This parameter limits the maximum intensity of rainfall. This should always be set to 100.

Volumetric Run-off: This sets the percentage of rain falling on a development site that reaches the modelled drainage network. This should always be set to 1.

E5.2 Simulation Criteria

Synthetic Rainfall: As with UK Rainfall above, the most up to date FEH data should be used.

Areal Reduction Factor: The Areal Reduction Factor should always be set to 1. Any reduction in this figure reduces the rainfall intensity.

Additional Flow: No allowance for climate change should be added in Additional Flow. This should be set to 0. Climate change should be added when running the simulation.

MADD Factor: The MADD Factor simulates extra storage in a system that may not in reality, be present. For all MicroDrainage model submissions the MADD Factor must be set to 0.

New Local Standard R for Design Parameters is shown overleaf.

New Local Standard R – Network Modelling Software Requirements

The design this should be submitted in MicroDrainage (.mdx) format.

Design Parameters

The rainfall data should be based on the most up to date FEH although IH124 will be considered

The M5 2 min rainfall must be set to 3.5mm

The maximum rainfall intensity should be set to 100

The volumetric runoff coefficient should always be 1.0

Simulation Parameters

The Areal Reduction Factor should always be set to 1

The MADD Factor must be set to 0

E5.3 Connection to the Highway Drainage Network

Shropshire Council will not normally permit a connection from any development into the highway drainage network. The highway drainage network in Shropshire has been constructed to serve the highway only, and any increase in surface water flows as a result of an un-consented connection will inevitably lead to increased flood risk downstream. Should a developer wish to make a connection to the highway drainage network they should contact the Drainage and Flood Risk Team at the earliest opportunity to discuss the proposed point of connection.

For any connection to be permitted, the highway drain to which the connection will be made must be improved to an adoptable standard (up to the point where the system either interacts with the public sewer network, or reaches a surface water outfall) and then offered up for adoption to STW. The highway drain upstream of the new connection will remain in the ownership of Shropshire Council.

Shropshire Council will also expect the developer to model (in line with the requirements set out in E5.2) the impact of the new connection on the receiving highway drainage network to prove that any connection will not cause upstream flooding due to a loss of capacity. The results of this modelling should be submitted to Shropshire Council for approval. Should the modelling predict flooding upstream as a result of the proposed connection, the developer should agree any necessary upgrades to the highway drainage network with Shropshire Council before approval will be granted.

All costs associated with this process including any physical upgrading of pipework, manholes and outfall structures, must be borne by the developer. Failure to secure adoption by STW will result in Shropshire Council refusing a connection. The principle of a connection to the highway network must be approved prior to planning permission being granted. In order to support this requirement, a new Local Standard in addition to those set out in Appendix B will applied to development in Shropshire.

New Local Standard Q - Connection to Highway Drainage Network

A connection to the existing highway drainage network will not be permitted unless the system downstream of the connection is put up for adoption by STW up to the point where this interacts with the existing public network or where it discharges to a surface water outfall.

A connection to the existing highway drainage network will not be permitted until model evidence has been submitted to show that any connection will not cause flooding to the public highway.

Any costs associated with this process including design fees, the physical upgrading of the highway drain to an adoptable standard, or those associated with the fee for adoption will be borne by the applicant.

E5.4 Location of SuDS Feature Components

The location of SuDS features must be carefully considered at the earliest opportunity. Shropshire Council will not approve any drainage layout where attenuation features serving more than a single property are located on land in private ownership or under allocated/private parking spaces. All features serving more than one property must be located in public or shared space.

As attenuation features are likely to form a strategic part of any on site drainage system, it is essential that they are always accessible. If located within private land, there may be difficulties in accessing manholes or control chambers during a flood event. Furthermore, should the replacement of a feature be required, any excavation in private property would result in un-necessary disruption for the homeowner. Whilst it may be possible to write access arrangements into property deeds, any disputes with homeowners may result in the need for enforcement action.

This approach also applies to developments where a housing trust or other organisation commissions a residential development. Although the site will technically be owned by a single body at the time of construction, there is no guarantee that this will remain the case throughout the lifetime of the development.

Shropshire Council do not permit the construction of surface water attenuation features under sections of the highway public highway unless these features are adopted by Shropshire Council or STW.

E5.5 Location Control Structures

Any chamber containing a control feature should, wherever possible, be constructed in a location that facilitates access for future maintenance. For control chambers serving systems adopted by STW located under the public highway, the developer should, wherever possible, avoid locating control features directly on highway junctions or in other high traffic areas. Control chambers should be either set back from a junction or located in the highway verge. Control chambers serving private SuDS features must also be located in POS/shared space with access arrangements clearly identified.

E5.6 Design of Below Ground Storage

Where attenuation tanks/cellular storage are used for surface water attenuation it is essential that they are installed to the specifications as set out by the manufacturer. All tanks should include an inspection chamber and appropriately designed sump to allow access for jetting and maintenance. The installation of appropriate venting on each tank which allows air to escape as the tank fills with water is also required. Failure to install a vent on an attenuation tank will restrict its ability to function. Cellular storage systems without internal walls should be specified in all locations to facilitate inspection though the use of CCTV apparatus.

For any planning submission which utilises tank storage Shropshire Council will require the submission of a detailed design of the proposed feature showing how access for maintenance will be provided and the locations of vents.

E5.7 Location of Soakaways and Drainage Fields

Whilst infiltration should always be the primary method of surface water disposal, the use and location of soakaways on new developments should be carefully considered. A soakaway has a limited design life therefore each feature must be constructed in a location that facilitates its future replacement. Any shared soakaways that cross property boundaries will be difficult to replace. In this circumstance it is likely that one party will be more adversely affected potentially leading to disputes. In order to avoid this on new developments where soakaways will be used to drain residential properties, Shropshire Council require the construction of individual soakaways for each residential unit. Where this is not possible, any soakaways serving multiple units must be constructed in accessible shared space or public open space to be managed by a maintenance company. Trench soakaways that span garden boundaries will not be permitted.

Where the provision of a positively drained foul system is not possible the above requirements should also be met when designing foul drainage fields from package treatment plants.

E5.8 Use of Pumped Surface Water Systems

Shropshire Council do not permit the use of pumped surface water systems on any new development. Development should always be directed to areas where a gravity connection to a suitable outfall can be provided. This requirement has been put in place because, regardless of the number of safety features that can be installed, or how well maintained the pumps are, a pumped system is liable to failure. Failure is likely during a storm event when the pumped system is under greater stress. Any failure of a pumped surface water system will result in flooding at an accelerated rate as the contributing system will not have a positive outfall. This has the potential to put properties or adjacent land at increased risk. Developers must therefore be able to demonstrate that any surface water drainage system can be achieved without the need for pumping. In order to support this requirement, Local Standard N in Appendix B has been amended as shown below. This supersedes the Local Standard N in the Appendix B for all development in Shropshire.

The use of foul pumping stations are acceptable; wherever possible these should be put up for adoption by STW.

Amended Local Standard N – Use of Pumped Systems

Shropshire Council do not support the use of surface water pumps on new development.

Development should always be directed to areas where a gravity connection to a suitable outfall can be provided. Areas that can not be drained by gravity should remain as Public Open Space.

Any proposed foul pumping stations should be built to an adoptable standard and put up for adoption by STW.

Appendix F Development Types

Reference	Shropshire Category	Туре	Description
01Q	А	Largescale Major Dwellings	200 or more dwellings to be constructed or 4ha or more when number of dwellings not given
02Q	А	Largescale Major Offices	Floor space of 10,000 sq.m or more or where site area is 2ha or more
03Q	А	Largescale Major Manufacture	Floor space of 10,000 sq.m or more or where site area is 2ha or more
04Q	А	Largescale Major Retail	Floor space of 10,000 sq.m or more or where site area is 2ha or more
05Q	Α	Largescale Gypsy/ Traveller	200 or more pitches
06Q	А	Largescale Major Other	Floor space of 10,000 sq.m or more or where site area is 2ha or more
07Q	В	Small-scale Major Dwellings	Between 10 – 199 dwellings to be constructed or site area is 0.5ha and less than 4ha where the number of dwellings is not given
s08Q	В	Small-scale Major Offices	Floor space of between 1,000sqm and 9,999sqm or where the site area is 1ha and less than 2 ha.
09Q	В	Small-scale Major Manufacture	Floor space of between 1,000sqm and 9,999sqm or where the site area is 1ha and less than 2 ha.
10Q	В	Small-scale Major Retail	Floor space of between 1,000sqm and 9,999sqm or where the site area is 1ha and less than 2 ha.
11Q	В	Small-scale Gypsy/ Traveller	Between 10 – 199 pitches
12Q	В	Small-scale Major Other	Floor space of between 1,000sqm and 9,999sqm or where the site area is greater than 1ha and less than 2 ha.
13Q	С	Minor Dwellings	1 - 9 dwellings (inclusive) constructed or a site area of less than 0.5ha where number of dwellings is not given
14Q	С	Minor Offices	Less than 1,000sqm or where the site area is less than 1ha.
15Q	С	Minor Manufacture	Less than 1,000sqm or where the site area is less than 1ha.
16Q	С	Minor Retail	Less than 1,000sqm or where the site area is less than 1ha.

Reference	Shropshire Category	Туре	Description
	C	Minor Gypsy/ Traveller	Between 1 – 9 pitches
18Q	С	Minor Other	Less than 1,000sqm or where the site area is less than 1ha.
19Q	D	Minerals Processing	
20Q	D	Change of Use	
21Q	D	Householder	
22Q	D	Advertisements	
23Q	D	Listed Building Consent	Applications to extend and/or alter
24Q	D	Listed Building Consent	Applications to demolish
25Q	D	Conservation Area Consent	
26Q	D	Certificate of Lawful Dev.	Both Proposed Use and Existing Use
27Q	D	OHL/TEL Notifications / TPO	
28Q	D	Trees in Cons. Area/ Hedgerow Removal	
42Q	D	Prior Notifications (Agri)	

Site area is defined as the area directly involved in some aspect of the development. Normally this will be the area outlined on the plan included with the application form. If the area involved in a development is split into two parts by a classified road it should still be considered as one site. The area occupied by the road should not be included in the site area.

The **floor space** of a building is defined as the sum of the floor area within the building, measured externally, at each level. * Basement car parks, rooftop plant rooms, staircases should all be included in the floor space figure. *If two floors then you calculate for each floor.

Change of Use: Many developments involve some change of use of land or building use but a decision should only be classified 'Change of Use' if:

- the application does not concern a major development
- no building or engineering work is involved

Where a largescale major or small-scale major development is subject to a change of use application, it should be coded as largescale major or small-scale major and not as a change of use. The use category will be determined by the 'end use' of the proposed change.

Householder Developments: are defined as those within the curtilage of a house (or a single flat) which require an application for planning permission and are not a change of use. Included in householder developments are; extensions, conservatories, dormer windows, alterations, garages, car ports or outbuildings, swimming pools, walls, fences, domestic vehicular accesses, porches, satellite dishes

Excluded from Householder Development: are applications relating to any work to two or more flats, applications to change the number of dwellings, changes of use to part or all of the property to non-residential (including business) uses, anything outside the curtilage of the property (including stables if outside the curtilage)

The application for a variation or removal of condition should be coded under the same code as the original application