



Flood Risk and Drainage Proof of Evidence

Planning Inspectorate Reference Number 6007402

Land at Patshull Road, Albrighton
Boningale Developments Ltd

SHF.710.011.HY.R.003.A

Planning
Architecture
Geoenvironmental
Hydrology
Ecology
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Transport
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Noise
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Flood Risk and Drainage Proof of Evidence	
Project	Land at Patshull Road, Albrighton
For	Boningale Developments Ltd
Reference	SHF.710.011.HY.R.003.A
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1 Preface

- 1.1 My name is Matthew James Travis, Managing Director of Enzygo Ltd
- 1.2 I hold an Upper Second class Bachelors of Science degree in Geography, from the University of Wales Aberystwyth, specialising in Hydrology, and a Master of Science Degree with Distinction in Catchment Dynamics and Management from the University of Leeds. I am a Member of the Chartered Institution of Water and Environmental Management and hold Chartered status as a Chartered Scientist and Chartered Environmentalist.
- 1.3 I have some 25 years' experience in assessing and modelling the effects of flooding and drainage from a variety of sources in different countries and climatic regimes.
- 1.4 I have given talks and seminars to R.I.C.S [Royal Institution of Chartered Surveyors] on the subject of 'Flood Risk and its effects on development'.
- 1.5 I have written several technical papers and presented at conferences on subjects including flood risk, flood modelling, flood warning and evacuation, and sustainable drainage systems.
- 1.6 I was a co-author in the re-write of Volume Four within the Design Manual for Roads and Bridges (DMRB) for the then Highways Agency (now National Highways Limited). The DMRB is the manual to which highway schemes are planned and designed. This document incorporated flood risk into the amended manual.
- 1.7 I also have international experience in carrying out Hydrological/Flood impact assessment for the BTC Pipeline project spanning Azerbaijan and Georgia.
- 1.8 I am the Managing Director of Enzygo Limited which I set up in 2008. Enzygo is a multi-disciplined environmental consultancy currently employing 80 staff. The company has carried out numerous environmental assessments for built development across the UK and our hydrology staff have carried out over 1,000 flood and drainage assessments in the past seven years. Our senior staff hold professional qualifications in Hydrology and the majority are chartered by the Chartered Institution of Water and Environmental Management.
- 1.9 I have prepared and provided flood risk/hydrological technical supporting information and evidence for several expert advice appointments, civil court matters and public inquiries.
- 1.10 I have been instructed to provide an independent review of the Flood Risk, Drainage and Foul Water strategies, their suitability and implementation.

2 Background

- 2.1 The proposed site in discussion at this appeal is for a proposed residential development, at land off Patshull Road, Albrighton, Shropshire. Flood risk and drainage information was most recently prepared by Enzygo Ltd at the time of the application [Flood Risk Assessment in **CD 8.1**] to supersede work undertaken by a previous consultant (Eastwood Consulting Engineers) [**CD 8.5**, report reference 48842-ECE-XX-XX-RP-C-0003, July 2024].
- 2.2 This development site will manage known surface water flood risk that will include providing betterment for local highways to provide a safe proposed development area. The proposed development requires measures to ensure policy compliance. There are no outstanding objections from any statutory bodies as outlined below.
- 2.3 Shropshire Council (the Lead Local Flood Authority or LLFA) were consulted on the previous Flood Risk Assessment (FRA) and drainage strategy authored by Eastwood Consulting Engineers [**CD 8.5**; also see separate drainage proforma in **CD 8.2**, and Drawings **CDs 8.7 to 8.16**]. The LLFA issued a holding objection to the FRA and drainage strategy on 23rd July 2024 requiring further works to address their comments.
- 2.4 In response to the LLFA comments, Enzygo Ltd produced an FRA Outline inclusive of Drainage Strategy [**CD 8.1**]; document reference: SHF.710.011.HY.R.001.A, dated December 2024. Accompanying the FRA was a Hydraulic Modelling Report [**CD 8.6**]; document reference SHF.710.011.HY.R.002.A, dated December 2024. In response, the LLFA removed their objection in correspondence received 9th January 2025.
- 2.5 No objections were received from the Environment Agency during the application. The Environment Agency did not respond to any consultation request by Shropshire Council on the application. However, the Environment Agency did contact the planning authority on 8th January 2025 [**CD 17.1**], having noted the planning notice for the Site and made reference to a groundwater monitoring borehole they had lost on the Site. This matter is unrelated to the application and not addressed further.
- 2.6 Severn Trent Water provided updated comments [**CD 17.1**] on the Enzygo FRA on 28th March 2025 following a holding objection issued on 8th August 2024 [**CD 17.1**] regarding sewer capacity. The updated comments confirmed that upgrades may be required on the Severn Trent Water sewer network to accept flows from the proposed development. A suggested informative was provided should a positive decision be issued on the application. Further arrangements on the nature and timing of connection would be made following issuing of a planning consent for the scheme.
- 2.7 The application was then appealed by Boningale Developments Ltd on the 31st March 2026. The reason for the appeal being against the refusal of planning permission under

planning reference 24/02108/OUT, decided by Shropshire Council on 16th December 2025.

- 2.8 Only two reasons for refusal have been provided on the scheme, both of which are not directly related to Flood Risk and Drainage matters.
- 2.9 The purpose of this statement is now only to respond to third-party objections, to assist with an explanation as to why the proposed development complies with all national and local policies on flood risk and drainage, demonstrating that the strategy is appropriate and should be allowed subject to appropriate conditions on surface water drainage. Flood risk and drainage is not an issue at this site, and the submitted evidence provides details on the rationale behind this statement. I address in section 5 of this Proof of Evidence the specific concerns raised by the R6 party and Third Parties in respect of the appeal application.
- 2.10 During preparation of this evidence, I visited the Site and am familiar with the flooding and drainage issues within the local area, having reviewed the third-party responses and worked on similar flooding issues.
- 2.11 I have been instructed as a hydrological consultant to provide expert evidence with regard to the appeal site and answer questions from the inspector and any third parties.
- 2.12 My brief is to review the information on drainage provided in support of the planning application and to provide my professional opinion on whether the information meets the requirements of the Local Planning Authority, Environment Agency and Local / National Guidance and regulations such that the planning application can be suitably conditioned in accordance with current planning policy guidelines in respect of flood risk and drainage. I was also asked to respond to concerns raised about flooding and drainage matters.

3 Flood Risk Assessment and Drainage Strategy

Site Description

- 3.1 The 47-hectare (ha) development is comprised of several agricultural land, divided into two distinct land parcels by Patshull Road, and generally falling in a southerly direction.
- 3.2 Soakaway testing undertaken by Enzygo Ltd in October 2024 (**CD 8.1** – Appendix 7) which described soils in the test pits to be clayey sand and silty sand. Across seven test locations covering the 47ha site, all pits failed to evidence sufficient uptake to calculate an infiltration rate. Given the presence of clay and low recorded infiltration in all locations, this site has low infiltration potential of soils for the Site.
- 3.3 Current land drainage relies on overland flow (exceedance) to the south towards the unnamed ditch located in the western development parcel which flows in culvert to the south under Holyhead Road to agricultural land within wider ownership of the developer.

Flood Risk

- 3.4 The risk of flooding is assessed as follows:
- The site is in Flood Zone 1; thus, the risk of fluvial flooding is assessed as low for the Site.
 - The Site has a low to high risk of surface water flooding, which form large areas of ponding and flow pathways. Measures dealing with surface water flooding are addressed in Section 4 of this proof of evidence.
 - The risk of flooding from all other sources is assessed as negligible.
- 3.5 The proposed residential use is classified as more vulnerable. More vulnerable uses are acceptable in terms of flood risk in Flood Zone 1 (low risk).

Surface Water Drainage Strategy

- 3.6 In accordance with requirement H3 of the Building Regulations 2010, and most recently the National SuDS Standards (July 2025), rainwater runoff must discharge to one of the following, listed in order of priority:
1. Collection for non-potable use: such measures are feasible and specific locations and details can be provided in the detailed design staged in response to a suitably worded planning condition at reserved matters.
 2. An adequate soakaway or some other adequate infiltration system: The use of infiltration-based SuDS is not feasible due to low infiltration rates into the clayey

soils and geology, as confirmed by testing (undertaken October 2024, **CD 8.1**, Appendix 7).

3. A watercourse: There are several ditches and watercourses located within the planning redline and wider ownership that provide viable discharge locations for surface water.
4. A sewer: There are no public surface water sewers located within the immediate vicinity of the Site.

3.7 The submitted detailed drainage strategy demonstrates surface water will, via a multi-stage treatment process, be attenuated in detention basins, and ultimately discharge to watercourses located in the Site boundary. The development proposals will provide a betterment by reducing the uncontrolled surface water discharge from the site explained below.

3.8 Runoff from the site will be discharged at QBAR, for all storms up to the 1 in 100-year event plus an allowance of 40% for climate change (CC) [**CD 8.1**, Section 6.5].

3.9 In summary the surface water drainage strategy is as follows:

- The proposed development will increase the area of impermeable surfaces and therefore increase the potential for an increased amount of runoff if a drainage strategy is not proposed.
- Surface water runoff from the development will be discharged to onsite watercourses via gravity where possible. In short, this means that runoff from the site will be reduced from the current predevelopment position.
- A SuDS drainage scheme is proposed to manage excess runoff from the development, comprising a multi-stage treatment process, which can include lined permeable paving and detention basins, with their associated water quality benefits (sufficient removal by SuDS features of total suspended solids, heavy metals and hydrocarbons associated with the proposed site uses and surfaces),
- A restricted outfall to onsite watercourses from the above proposed SuDS system will mean discharge above the QBAR rate up to the 1 in 100-year plus climate change rainfall event will be capped at QBAR. This provides betterment for the watercourse within and downstream of the Site.
- A SuDS treatment train will improve water quality and safeguard any downstream designations with hydraulic connectivity to the development. A maintenance and management plan will ensure the effectiveness of the drainage strategy during the operation phase. Just add that the approach is not novel but represents a tried and tested approach to flood risk management and drainage matters.
- Implementation of a Construction Environmental Management Plan (CEMP) during the construction phase will manage surface water and foul drainage,

thereby mitigating the potential for impacts on hydrology, flood risk, and water quality.

Summary and Conclusion

- 3.10 The proposed residential use is classified as more vulnerable. More vulnerable uses are acceptable in terms of flood risk in Flood Zone 1 (low risk), which the site is. Surface water flood risk is managed and provides betterment along adjacent highways outside of the Site boundary. Site drainage will be controlled through a robust SuDS strategy comprised of multi-stage treatment and attenuation in detention basins, as demonstrated by the Flood Risk Assessment and associated drawings and calculations [CD 8.1].

4 Flood Risk Betterment

Location

- 4.1 The proposed development currently falls broadly in a southerly direction, and due to the superficial ground conditions (i.e. saturated soils on clayey diamicton and mudstone bedrock) [CD 8.1, Section 3.4], runoff is predominantly uncontrolled overland flow, with limited infiltration, particularly during extended periods of rainfall.
- 4.2 The proposed drainage strategy [CD 8.1, Drawing SHF.710.011-ENZ-XX-XX-DR-D-0001], proposes discharging water from the site to two watercourses within the application boundary, in line with the Drainage Hierarchy. This will result in a betterment to downslope land, highways and infrastructure, as the existing site's uncontrolled runoff is then managed, reducing flood risk to the surrounding area.
- 4.3 Therefore, all rainfall events from the annual flood up to the 100-year plus an allowance for climate change would be controlled, providing a demonstrable betterment from the current uncontrolled situation.
- 4.4 As per the Flood Risk Assessment [CD 8.1, Table 6.1], the proposed discharge rate for the Site developable area is QBAR for respective drainage catchments. Therefore, discharging from the site at QBAR will create betterment across all return periods at or above this flow rate, up to the 1 in 100+40%CC event (Table 4.1 below).

Table 4.1 Proposed Site Runoff

Annual Probability (Return Period, Years)	Greenfield Runoff (l/s) for each drainage catchment								
	A	B	C	D	E	F	G	H	I
QBAR	4.36	4.20	3.13	3.41	13.90	15.05	12.11	8.35	0.92
1% Plus Climate Change	15.71	15.12	11.24	12.28	50.02	54.15	43.58	30.06	3.32
Difference l/s	-11.35	-10.92	-8.11	-8.87	-36.12	-39.07	-31.47	-21.71	-2.4
% Decrease	72.25	72.22	72.15	72.23	72.21	72.21	72.21	72.22	72.29

Summary

- 4.5 The FRA [**CD 8.1**] demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national and local policy and guidance.
- 4.6 The drainage design measures as part of the development will provide the opportunity to introduce betterment to flood risk outside of the development [**CD 8.1**].
- 4.7 The development should not therefore be refused on the grounds of flood risk or surface water drainage.

5 Local and National Policy Compliance

Local Policies

5.1 Policy CS18: Sustainable Water Management, covers the following:

“Developments will integrate measures for sustainable water management to reduce flood risk, avoid an adverse impact on water quality and quantity within Shropshire, including groundwater resources, and provide opportunities to enhance biodiversity, health and recreation, by ensuring that:

- Planning applications and allocations in the Site Allocations and Management of Development (SAMDev) DPD, are in accordance with the tests contained in PPS25, and have regard to the SFRAs for Shropshire;”

5.2 PPS25 is superseded by Planning Practice Guidance. Specifically, PPG ID7 covers flood risk and drainage issues and is covered in the sub-section on national policy below. The SFRA was consulted in the FRA (**CD 8.1**, para 4.2.3).

- “New development is designed to be safe, taking into account the lifetime of the development, and the need to adapt to climate change. Proposals should have regard to the design guidance provided in the SFRAs for Shropshire;”

5.3 Climate change impacts have been robustly assessed and dealt with by the proposed surface water interception measures detailed in the FRA (**CD 8.1**, Section 4.5, where the 1000-year event exceeds the 1 in 100-year plus climate change event) and the proposed SuDS strategy with the inclusion of climate change in the established attenuation volumes in proposed storage features ensuring a capped discharge rate at QBAR up to the 1 in 100-year +40% climate change rainfall event (**CD 8.1**, Section 6).

- “All development within local surface water drainage areas, as identified by the Water Cycle Study, and any major development proposals, demonstrate that surface water will be managed in a sustainable and coordinated way. Proposals will be supported by either a Surface Water Management Statement or Plan, depending on the scale of the development;”

5.4 The development is considered major and the proposed SuDS strategy detailed in the FRA (**CD 8.1**, Section 6 and Drawing SHF.710.011-ENZ-XX-DR-D-0001) shows two stages of treatment with restricted outfalls to watercourses at QBAR up to the 1 in 100-year plus 40% rainfall event which is sufficient detail for outline stage, and the LLFA had no objection to the drainage and flood measures at the point of determining the application.

- “All developments, including changes to existing buildings, include appropriate sustainable drainage systems (SUDS) to manage surface water. All developments

should aim to achieve a reduction in the existing runoff rate, but must not result in an increase in runoff;"

5.5 This is achieved as detailed in para 5.4 of this proof of evidence.

- "New development improves drainage by opening up existing culverts where appropriate;"
 - This is achieved as detailed in para 5.4 of this proof of evidence.
- "Proposals within areas of infrastructure capacity constraint, as identified by the Water Cycle Study and the Implementation Plan, and any major development, demonstrates that there is adequate water infrastructure in place to serve the development;"

5.6 The Water Cycle Study, as mentioned by the above policy reference (**CD 8.17**), states the "Adopted WRMP [...covering Albrighton] has planned for the increased demand based on the housing growth figures provided. If significantly higher growth rates are expected, we would need to reassess. This site is located in an area that is significantly affected by WFD WINEP and would not be a favoured site."

5.7 Therefore, development is planned for in Albrighton. Severn Trent Water has a statutory obligation to provide a water supply to consented development. The development is on their tracker for wastewater (**CD 8.1**, Appendix 3, pdf page 93), so Severn Trent Water are aware the scheme has been proposed.

- "New development enhances and protects water quality, including Shropshire's groundwater resources;"

5.8 This is achieved as detailed in para 5.4 of this proof of evidence.

- "New development, including changes to existing buildings, incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure."

5.9 This is noted and can be secured by planning condition.

National Policies

5.10 The proposed development conforms to Planning Practice Guidance (PPG7), the National Planning Policy Framework (NPPF Chapter 14, paras 161 to 186), and the National Standards for Sustainable Drainage Systems, of which there are six applicable to outline development proposals. The LLFA had no objection to the flood risk and drainage matters at the point the application was determined (**CD 17.1**).

6 Concerns Raised by Rule 6 Party and Third Parties

Introduction

- 6.1 I have, below, drawn out common themes raised by the Rule 6 Party (Albrighton Development Action Group) and other interested third parties in relation to flood risk and drainage matters concerning the proposed development and provide responses to those comments in turn.

Rule 6 Statement of Case

- 6.2 The Rule 6 Statement of Case does not detail an objection in relation to flood risk or drainage matters for the proposed development. The following matters were gleaned from the comments of other interested third parties.

Existing Flood Problems

- 6.3 In summary, interested third parties stated concerns about existing flood issues affecting Cross Road (north-western boundary of the Site up to the northern extent of the Site boundary), Newhouse Lane (the eastern extreme of the Site adjacent the south-eastern access land parcel), Shaw Lane (1.1km northeast of the northern extent of the Site) and Patshull Road (the minor road dividing the western and eastern development parcels of the Site, which is proposed to be closed as part of the proposals). These roads are stated by interested locals to be impassable during flooding, affected by standing water for extended periods. A minority of comments mention the incidence of property flooding from such events.
- 6.4 The flooding issues affecting particularly Cross Road and Patshull Road are known to me from imagery of flooding passed to the appellant in 2024. The northern end of Patshull Road and lengths of Cross Road in the vicinity of the northern extent of the site have been historically flooded on the highway. As a reminder, the site area generally slopes south, which means water flooding the highways of Cross Road and Patshull Road is from the urbanised catchment north of the Site. Furthermore, as detailed in Section 3 of the FRA (**CD 8.1**, Figure 3.12, page 19), there is a highly silted and vegetated former highway ditch which would receive runoff shedding from the Patshull Road and Cross Road junction area. Some desilting in the past has raised the embankment of the ditch as it abuts the highway, which prevents flows from shedding into the ditch. This water then sits in the highway where any existing dedicated highway drainage (gullies and pipework) is exceeded, either through lack of capacity or lack of maintenance.
- 6.5 Section 6 of the FRA (**CD 8.1**) demonstrates the proposed surface water drainage scheme will allow water shedding from the Patshull Road/Cross Road junction to flow

into the proposed ditch network that will route flows south through the site. Therefore, with the proposed development coming forward, a significant betterment will occur where drainage exceedance on highways at the northern extent of the Site will be provided a conveyance route, improving the flooding issues evident on these local highways.

- 6.6 Highway flooding on Newhouse Lane and Shaw Lane are not areas where the Site will be able to mitigate such flooding, nor should it be the developer's responsibility to solve flooding issues in those locations. Shropshire Council as the local highways maintenance organisation are riparian owners of those flooding locations and have a responsibility to remediate flooding issues on those roads. The development of the appeal site will have no material effect on these areas.

Impact of development on surface water runoff

- 6.7 Some interested parties commenting on the proposals have raised concerns that the development will introduce hard surfaces including roads, roofs and driveways. Their comments suggest runoff emanating from such surfaces will lead to increased flood risk and a reduced ability of the site soils to allow rainfall to infiltrate.
- 6.8 As detailed in the FRA (**CD 8.1**, Section 6), the proposed development will have a comprehensive drainage scheme, designed to intercept and manage existing surface water flooding, occurring both as ponding and flow pathways within the Site boundary. Furthermore, the proposed sustainable drainage system (SuDS) will intercept runoff from hard surfaces and route this water to the proposed attenuation features (largely comprised of basins with some cellular storage proposed for areas constrained). The runoff will be stored and discharged at the equivalent rate of QBAR (approximately the 2.3-year return period event) for all events up to the 1 in 100-year plus climate change event. This reduction for the most extreme event is a minimum of 72.15% (Table 4.1 of this proof), ensuring significant betterment for downstream watercourse and associated flood risk.
- 6.9 The proposed drainage strategy therefore conforms with the requirements set out in the National Standards for Sustainable Drainage Systems (July 2025), Standard 3: Management of extreme rainfall and flooding.

Existing drainage infrastructure lacks capacity

- 6.10 Local interested parties have commented about the existing surface water and foul water drainage network in Albrighton lacking capacity. Surface water systems in highways are regularly overwhelmed by heavy rainfall. The concerns regarding the foul water system are that they lack capacity to accept the proposed 800 homes and other proposed uses.

- 6.11 Regarding local surface water drainage associated with existing development and highways, these assets will be the responsibility of the local sewer undertaker (Severn Trent Water) or the local highways team (Shropshire Council).
- 6.12 Severn Trent Water have a statutory obligation in accordance with the Water Industry Act 1991 to provide functioning sewer infrastructure and accept flows from consented development. They are enabled to demand infrastructure charges from developers for every unit of development connected to their network, to help the fund the works. Thus, without development, improvements to Severn Trent Water assets may be less likely to occur.
- 6.13 Enzygo have consulted Severn Trent Water regarding the foul drainage for the proposed scheme (FRA **CD 8.1**, Appendix 3). They have confirmed they do not currently have capacity to allow a sustainable connection from the development at this time. However, following consent which they are tracking, they will look to provide upgrades to facilitate the development's future foul connections. This is standard practice for UK based sewer companies when consulted in pre-development enquiries relating to foul flows from large schemes such as the appeal proposals.
- 6.14 Shropshire Council have government funding to undertake highways improvements that also covers the provision of drainage for their roads. They are riparian owners of the proposed highways drainage assets. The developer is not responsible for remediating this drainage infrastructure. That said, some flooding that is known to occur on the junction of Cross Road and Patshull Road will be improved by the proposed development's drainage system thus providing betterment which is beyond the developer's responsibility for surface water drainage.

Downstream flood risk

- 6.15 Local interested parties have commented on the scheme with concerns the proposed development will create surface water which will flow into existing residential areas and affect nearby villages such as Boningale to the south-east. Commenters state the loss of greenfield areas as a result of development, removes a natural flood buffer, worsening flooding on roads, adjacent land and existing residential areas near the development.
- 6.16 As evidenced in the FRA (**CD 8.1**, Section 4.5), and supported by a hydraulic modelling study related to surface water for the Site (**CD 8.6**), flows route south, away from the main urbanised areas of Albrighton, will create betterment for flooding currently experienced on Cross Road/Patshull Road junction, collect and store surface water that drains from the Site and release this water in the onsite watercourses at a restricted rate, ensuring less water leaves the Site than in its current undeveloped state and across a large range of flood event return periods.

Confidence in proposed measures

- 6.17 Scepticism of the assessment of flood risk for the site and the robustness of the proposed SuDS strategy is evident in the comments raised by some third parties on the proposed scheme. One commenter states that models (including hydraulic models such as that used to assess surface water flood risk for this development) are unreliable. The proposed measures for the site as a result of the flood risk assessment are doubted by some commenters to be suitable for any future extreme weather or climate change impacts. There were also concerns surrounding the maintenance of proposed measures to manage surface water flood risk and drainage, and whether they will continue to operate as effectively in the long term and organisations charged with the maintenance and management of drainage assets will be held to account for any degradation in the operation of those assets.
- 6.18 Even at this outline stage, the hydraulic model (detailed in **CD 8.6**) supporting the Flood Risk Assessment (**CD 8.1**) for this scheme has been built in accordance with Environment Agency best practice. Furthermore, on receipt of the modelling report and files, the LLFA withdrew their holding objection in acceptance of the modelled flood risk determined for the site by that model. The local planning authority, Shropshire Council, have not raised flood risk and drainage as a reason for refusal on the scheme.
- 6.19 The performance of the proposed measures on the scheme (which includes but is not limited to a SuDS strategy, interception ditches which will convey flood risk from the highways to the north of the site as well as water in the site and a upgraded downstream culvert) has been designed with extreme flood events with the influence of climate change in mind. Section 4.5 of the FRA (**CD 8.1**) describes the proposed SuDS scheme. The basins have been designed to attenuate up to the 1 in 100-year plus an allowance of an additional 40% of this storm to account for climate change. The drainage design software calculations also carry a safety factor, and basins are designed with a 300mm freeboard allowance. There will also be additional storage provided in the final drainage network upstream of the basins which is not accounted for. Therefore, uncertainty in the effect of climate change and extreme events is already very well catered even at this outline stage.
- 6.20 Section 6.5 of the FRA (**CD 8.1**) also details the recommended maintenance requirements of the main proposed SuDS features for the scheme at outline stage. There will likely be the requirement to provide a maintenance and management plan document in response to a suitably worded condition at reserved matters stage for the scheme. This plan would be implemented by adopting organisations for respective elements of the drainage strategy (either the local authority or sewerage undertaker), with the option to engage a private maintenance company for any remaining or indeed all elements of the SuDS and flood measures infrastructure if required. Maintenance

organisations can be held to account by the Lead Local Flood Authority under the Land Drainage Act 1991 to ensure they maintain drainage assets to the standard at which they were originally installed.

Disruption from proposed measures and drainage upgrades

- 6.21 Some interested third parties raised the matter of disruption to local residents from the drainage works and upgrades that will be required to facilitate the scheme. There are concerns there would be delays in delivery of upgrades and necessary drainage, such that homes on the proposed development could be occupied before the necessary upgrades have been implemented.
- 6.22 The conditions for the development would likely ensure that no home or other use could be occupied until the proposed SuDS scheme had been fully constructed.
- 6.23 Furthermore, when the future developer applies for a S106 drainage connection for the Site, they will have to satisfy Severn Trent Water's requirements to ensure where the developer proposes to make foul drainage connections, Severn Trent Water are satisfied at that time that the network location is already a sustainable connection point without the need for upgrades prior.
- 6.24 On the matter of necessary foul system upgrades, at the point that consent may be granted for the scheme by way of this appeal being allowed, Severn Trent Water (who monitor applications held in their development tracker; this scheme is already listed – FRA **CD 8.1**, Appendix 3), will then schedule (as is its statutory duty) required upgrades based on the proposed dwelling numbers already provided to them as part of their asset management plans. This will be timed to ensure they meet capacity demands from the construction of the proposed development. If those upgrades are at risk of not being timed correctly, Severn Trent Water will notify the S106 drainage connection applicant and not provide a point of connection and discuss those timings.
- 6.25 I interpret that the local residents of Albrighton would welcome any upgrades to the local sewer network that improves the drainage situation for the settlement. No doubt the upgrades may cause some minor disruption to road networks during the required upgrades. It is important to remember, however, that the funding situation that brings about much needed drainage upgrades is significantly bettered by infrastructure charges paid by developers of schemes such as the appeal site.
- 6.26 In summary, there are legislative and legal barriers in place to ensure buildings are not occupied until drainage has been installed (managed by way of planning conditions and local authority enforcement), sewer companies monitor the planned development and trigger network upgrades (as is its statutory duty). Severn Trent Water can refuse drainage connection applications in order to manage connections in advance of capacity being made available; though with their planning system already in place,

this should not need to happen. There will always be disruption from the upgrade of services as highways are a conduit for such assets. However, the need for upgrades to drainage assets and similar outweighs the inconvenience of any disruption to travel routes around Albrighton.

Loss of natural drainage capacity

- 6.27 Finally, some third parties have raised the point that the undeveloped site currently acts as a natural flood management area, where flood water is stored and the ground natural absorbs rainfall. There are concerns that the building of the proposed development will remove the natural characteristics of the soil to uptake rainwater and remove the storage capacity of the site for flooding and potentially displace this water and increase downstream flood risk.
- 6.28 My first point would be is that highway flooding as discussed in this proof, is a problem around the roads located in the north of the site. Without the interception ditches and flood alleviation (detailed in the modelling report **CD 8.6**) that will result from the scheme, no betterment will be seen in managing the drainage exceedance currently occurring on the junction of Cross Road and Patshull Road.
- 6.29 Furthermore, the proposed SuDS strategy (**CD 8.1**, Section 6 and Drawing SHF.710.011-ENZ-XX-DR-D-0001 – Outline Drainage Strategy), is designed to discharge at a rate not in excess of the mean annual peak flow (QBAR), across a large range of flood return periods all the way up to the 1 in 100-year plus 40% climate change event. The undeveloped site will currently allow any water generated from a saturated site to flow downstream unmanaged. The proposed scheme will in fact enhance the Sites ability to intercept flooding occurring at the northern extent of the Site and then also hold water falling within the site boundaries and release at a significantly reduced flow rate.

7 Summary and Conclusions

- 7.1 The FRA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national and local policy and guidance. The incorporated design measures as part of the development have provided the opportunity to introduce a measurable betterment to offsite flood risk.
- 7.2 A flood alleviation strategy for surface water flood risk on the undeveloped site will intercept flood water from highways to the north of the Site and preferentially route this water in interception ditches through the development, creating significant betterment while releasing land for development.
- 7.3 A SuDS drainage strategy is proposed to manage surface water runoff rates post-development. This will be achieved through gravity discharge to existing watercourses and proposed interception ditches in the of the developer's ownership, with appropriate discharge rates and appropriately sized attenuation.
- 7.4 The surface water drainage strategy during the construction phase will be integrated into a Construction Environment Management Plan (CEMP). The quality of surface water runoff from the proposed development during the operational phase will be improved through the adoption of a SuDS drainage strategy. A maintenance and management plan (carried out by a private maintenance company) will ensure the effectiveness of the drainage strategy for the lifetime of the development. Details can be managed through a condition.
- 7.5 There are no statutory objections on flood risk, drainage and water quality grounds. Concerns of other third parties are addressed by the submitted flood risk and drainage evidence. Additional information required can be secured by condition as outlined in relevant statements of common ground.
- 7.6 In my professional opinion the proposed site in discussion at this appeal, with regard to Flood Risk and Drainage, complies with National and Local Policies and should not be precluded on these grounds.

8 Statement of Truth

- 8.1 The evidence which I have prepared and provide in this written statement is true [and has been prepared and is given in accordance with the guidance of my professional institution] and I confirm that the opinions expressed are my true and professional opinions.
- 8.2 Artificial Intelligence ("AI") has not been used to draft or substantially rewrite text; produce a summary or analysis; generate or alter images or videos; or create content that goes beyond straightforward formatting or presentation.

Signature:



Matt Travis BSc, MSc, MCIWEM, C.WEM, C.Env, C.Sci

Date: 18th August 2026



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