We have reviewed the LLFA response carefully with our drainage consultant, whose reply to Alice at the LLFA is set out below. I would be grateful if you could pass it along.

In summary, we are not disputing the need for the further information, but consider that, in the specific circumstances of this site, it can be properly secured by condition without any risk to the outcome. In particular:

- The site is at very low risk of groundwater flooding, and all available evidence indicates groundwater is well below the depth of the proposed soakaway (the nearest BGS borehole struck water at 16m below ground level).
- There is a proven local precedent. The existing pressing centre, less than 100m away on the same site, has drained successfully to soakaways for around 10 years with no recorded flooding issues.
- There are no sensitive off-site receptors. The site is in an open countryside location, so there is no realistic risk to neighbouring properties even in the unlikely event of a problem.
- There is a viable fallback. If monitoring were to show groundwater higher than expected, an alternative drainage solution can be accommodated within the site (see below). The principle of acceptable drainage is therefore not in doubt. Only the final detailed design remains to be confirmed.
- Winter monitoring is physically impossible until January and April 2027. Requiring it upfront would delay a decision for months without changing the outcome.
- We would be happy to accept a pre-commencement condition (suggested wording is included in the consultant's response) so that no drainage works could be built until the LLFA has approved the monitoring results and final design. The LLFA would therefore retain full control.

Consultant's Response to the LLFA as follows:

Hi Alice,

Thank you for your comments on the Flood Risk Assessment and Drainage Strategy for the proposed pressing centre at Knowe Top Farm. We fully acknowledge the

points raised. Our aim below is to show that both can be robustly resolved through a planning condition, with no risk that an acceptable drainage solution cannot be delivered.

1. Geology / infiltration test location

The soakaway test location is shown on page 50 of the report. The test was undertaken at an early stage to confirm the feasibility of infiltration before the Drainage Strategy was developed. As shown on the Drainage Strategy drawing, the test location is approximately 10m from the north-east corner of the proposed soakaway. We accept that geology can vary over short distances. To address this, we propose that a ground investigation contractor carries out investigation at both locations to confirm that the geology beneath the proposed infiltration trench matches that at the test location. This can be secured through a planning condition.

2. Winter groundwater monitoring

We acknowledge the requirement for winter groundwater monitoring where infiltration is proposed. Because the design was undertaken in May to July 2026, it has not been possible to carry out winter monitoring before submission. The next available window is January to April 2027, though we can start this earlier if that would be acceptable to the LLFA. However, we note that desktop evidence strongly indicates that winter groundwater will remain more than 1m below the base of the proposed soakaway:

- Very low groundwater flood risk. The site is identified as being at very low risk of groundwater flooding (para 6.4 of the report).
- Deep groundwater. The nearest BGS borehole record struck water at 16m below ground level (para 5.2.3 and Appendix 6.
- Proven local performance. The existing Knowe Top Farm pressing centre, less than 100m to the south and on the same geology, drains to soakaways (para 6.3.4; HDC ref. DC/14/2741). It has operated for around 10 years with no recorded surface water flooding issues.

3. Fallback if groundwater is higher than expected

In the unlikely event that monitoring were to show groundwater within 1m of the soakaway base, the following alternatives could be accommodated within the site boundary:

- a shallower, infiltration trench ((i.e. using geocellular crates) maintaining the required 1m freeboard
- lined attenuation with controlled discharge at greenfield rate to watercourse to the east

The site is in open countryside under the applicant's control, with ample space for either option. A viable drainage solution can therefore be delivered in all scenarios and therefore can be secured by planning condition.

4. Proposed condition

We propose the following monitoring programme:

- winter groundwater monitoring to a minimum depth of 3m bgl (1.3m below the proposed soakaway base) to be undertaken post decision and confirmatory ground investigation at the soakaway and test locations.

Suggested condition wording:

“No development shall commence above slab level until a drainage strategy detailing the proposed means of surface water disposal has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme. Details shall include (a) the results of ground investigation confirming the geology at the location of the proposed infiltration feature; (b) the results of winter groundwater monitoring undertaken to a depth of no less than 3m below ground level.”

This would give the LLFA full approval of the final design before construction, while allowing the application to be determined now. We would be happy to discuss the wording or meet if that would be helpful.