**PLANNING COMMITTEE DATE: 11 January 2023** 

APPLICATION NO: F/YR22/0354/F

SITE LOCATION: 134A Ramnoth Road, Wisbech

# **UPDATE**

## **Consultee Comment**

# Cambridgeshire County Council Lead Local Flood Authority (LLFA)

We have reviewed the following documents:

- Flood Risk Assessment and Sustainable Drainage Strategy, MTC Engineering, Ref: 2719 –FRA & DS – Rev C, Dated: December 2022
- Response to LLFA Comments, MTC Engineering, Dated: 24 May 2022
- Proposed Residential Development Planning, Peter Humphrey Associates, Ref: 6066-PL01k, Dated: July 2021 (uploaded to Fenland Planning Portal 10 November 2022)
- Proposed Residential Development Planning, Peter Humphrey Associates, Ref: 6066-PL01k, Dated: July 2021 (uploaded to Fenland Planning Portal 28 November 2022)

The applicant has confirmed that the alterations within the proposals will not change the layout or impermeable area of the development. The amendment does not appear to have any surface water flood risk or drainage implications so we have no further comments to make. Therefore, our position remains that we, as Lead Local Flood Authority (LLFA), have no objection in principle to the proposed development.

The above documents demonstrate that surface water from the proposed development can be managed through the use of permeable paving, and geocellular storage, restricting surface water discharge to 2.5 l/s into the surface water sewer, as agreed with Anglian Water.

The LLFA is supportive of the use of permeable paving as in addition to controlling the rate of surface water leaving the site it also provides water quality treatment which is of particular importance when discharging into a watercourse.

Water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual.

We request the following conditions are imposed:

#### Condition 1

No laying of services, creation of hard surfaces or erection of a building shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed Flood Risk Assessment and Sustainable Drainage Strategy prepared by MTC Engineering (ref: 2719 – FRA & DS – **Rev C) dated December 2022** and shall also include:

- a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;
- b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;
- c) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);
- d) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);
- e) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- f) Demonstration that the surface water drainage of the site is in accordance with DEFRA nonstatutory technical standards for sustainable drainage systems;
- g) Full details of the maintenance/adoption of the surface water drainage system;
- h) Permissions to connect to a receiving watercourse or sewer;
- i) Measures taken to prevent pollution of the receiving groundwater and/or surface water

### Reason

To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts.

## Condition 2

No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence.

### Reason

To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts.

### Informatives

## Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

<u>Resolution:</u> No change to the recommendation which is to grant the application as per Section 12 of Agenda item 5 on page 55.

Condition 3 is however required to be amended as follows, to refer to the updated Flood Risk Assessment and Sustainable Drainage Strategy:

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The scheme shall be based upon the principles within the agreed Flood Risk Assessment and Sustainable Drainage Strategy prepared by MTC Engineering (ref: 2719 – FRA & DS – **Rev C) dated December 2022** and shall also include:

- a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;
- b) Full results of the proposed drainage system modelling in the abovereferenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;
- c) Detailed drawings of the entire proposed surface water drainage

system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);

- d) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);
- e) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- f) Demonstration that the surface water drainage of the site is in accordance with DEFRA nonstatutory technical standards for sustainable drainage systems;
- g) Full details of the maintenance/adoption of the surface water drainage system;
- h) Permissions to connect to a receiving watercourse or sewer;
- i) Measures taken to prevent pollution of the receiving groundwater and/or surface water

### Reason

To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts.

A pre-commencement condition is necessary in order to ensure that surface water drainage is adequately dealt with and thereafter retained in perpetuity.