

Your ref: R18/0186
Our ref: WCC001045 R4/FRM/MB/001
Your letter received: 18/05/2022



SENT BY EMAIL

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FAO Erica Buchanan

06 June 2022

Dear Ms Gibrat

PROPOSAL: Demolition of existing buildings and outline planning application (with matters of access, layout, scale, and appearance included) for residential development of up to 137 dwellings (Use Class C3) including means of access into the site from the Rugby Road, provision of open space and associated infrastructure and provision of sports pitch, erection of pavilion and formation of associated car park (details to be confirmed) (amended Plans).

LOCATION: Coventry Stadium Rugby Road Coventry Warwickshire CV8 3GJ

Warwickshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the application which was received on the 18 May 2022. Based on the information submitted the LLFA has **No Objection** subject to the following conditions.

Condition

No development shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles has been submitted to and approved in writing by the Local Planning Authority in consultation with the LLFA. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme to be submitted shall:

1. Where infiltration is demonstrated to not be feasible, limit the discharge rate generated by all rainfall events up to and including the 1 in 100 year (plus an allowance for climate change) critical rain storm to the QBar Greenfield runoff rate of 16.1l/s for the site in line with the approved surface water drainage strategy (ref: INV109/2021/FRA, dated July 2021).
2. Provide drawings / plans illustrating the proposed sustainable surface water drainage scheme. The strategy agreed to date may be treated as a minimum and further source control SuDS should be considered during the detailed design stages as part of a 'SuDS management train' approach to provide additional benefits and resilience within the design.
 - a. WCC LLFA notes that Landscaping is a matter reserved for approval at later however an indicative landscape masterplan has been provided which shows a swale /



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- raingarden type feature however this is not illustrated within the submitted strategy.
- b. The strategy could be considered 'pipe-to-pond' in nature and in line with the above, how can the drainage strategy be enhanced through the use of above-ground conveyance techniques?
 - c. The site does appear to have significant open space and as such is there potential for roadside swales through the development and if so, how does the layout need to be revised before it is approved?
 - d. What further SuDS features can be considered to enhance water quality such as permeable paving within shared driveways and courtyards etc?
3. Provide an assessment of potential water quality hazards and provision of appropriate mitigation.
 4. Provide detailed drawings including cross sections, of proposed features such as attenuation features, and outfall structures. These should be feature-specific demonstrating that such the surface water drainage system(s) are designed in accordance with 'The SuDS Manual', CIRIA Report C753.
 5. Provide detailed, network level calculations demonstrating the performance of the proposed system. This should include:
 - a. Suitable representation of the proposed drainage scheme, details of design criteria used (incl. consideration of a surcharged outfall), and justification of such criteria where relevant.
 - b. Simulation of the network for a range of durations and return periods including the 1 in 2 year, 1 in 30 year and 1 in 100 year plus 40% climate change events
 - c. Results should demonstrate the performance of the drainage scheme including attenuation storage, flows in line with agreed discharge rates, potential flood volumes and network status. Results should be provided as a summary for each return period.
 - d. Evidence should be supported by a suitably labelled plan/schematic (including contributing areas) to allow suitable cross checking of calculations and the proposals.
 6. Provide overland flow routing, supported by plans such as external levels. Such overland flow routing should:
 - a. Demonstrate how runoff will be directed through the development without exposing properties to flood risk.
 - b. Consider property finished floor levels and thresholds in relation to exceedance flows. The LLFA recommend FFLs are set to a minimum of 150mm above surrounding ground levels.
 - c. Recognise that exceedance can occur during any storm event due to a number of factors therefore exceedance management should not rely on calculations demonstrating no flooding.

Reason

To prevent the increased risk of flooding; to improve and protect water quality; and to improve habitat and amenity;

Condition:

No occupation and subsequent use of the development shall take place until a detailed, site specific maintenance plan is provided to the LPA in consultation with the LLFA. Such maintenance plan should

1. Provide the name of the party responsible, including contact name, address, email address and phone number
2. Include plans showing the locations of features requiring maintenance and how these should be accessed.
3. Provide details on how surface water each relevant feature shall be maintained and managed for the life time of the development.
4. Be of a nature to allow an operator, who has no prior knowledge of the scheme, to conduct the required routine maintenance

Reason:

To ensure the future maintenance of the sustainable drainage structures.

Notice to LPA / Applicant regarding the conditions

Whilst the applicant has demonstrated the principles of an acceptable surface water management strategy at the site, further information is still required as detailed above.

The applicant may prefer to provide these additional details at a later date during the detailed design stage and therefore we have recommended an appropriate pre-commencement condition to ensure that these details will be provided for review and approval by the LPA and LLFA before the development commences.

Alternatively, the applicant may wish to avoid any pre-commencement conditions therefore the information set out above should be provided at this stage prior to the determination of the planning application. Subject to the approval of such details, the LLFA would subsequently seek the agreed plans to be included within any 'built in accordance with' type condition.

Informatives for the next stage of design

As outlined within the condition, the strategy should be treated as a minimum at this stage of the design. Further consideration should be given during the next stage of the design to incorporate additional, localised source control SuDS such as wales, rain-gardens and tree pits as part of a 'SuDS management train' approach to provide water quality, amenity and bio-diversity benefits and increase the resilience within the design.

At the 'discharge of condition' stage proposals for surface water drainage should be approaching a level of detail suitable for tender or construction. Documentation should show the drainage scheme including SuDS features, specific details (e.g. standard details or cross sections) and demonstrate the performance and of the system through calculations and exceedance management respectively. Such scheme should be in line with the original planning application/permission and where significant changes are made, justification should be provided.

Where a new connection to an ordinary watercourse is made to facilitate the developments drainage, ordinary watercourse land drainage consent should be obtained before the works are undertaken.

Yours sincerely

Mark Banning

Mark Banning
Planning & Sustainable Drainage Engineer

Approved Documents:
NV109/2021/FRA
343A08_104 Area of Development Plan