

Land East of Kenilworth Development Brief

WCC Flood Risk Management Comments – December 2018

No.	Paragraph No.	Comment
01	Page 52 &53 – Landscape features	<ul style="list-style-type: none">- The LLFA are pleased that watercourses are described as having the potential to form amenity features. The LLFA would recommend inserting the word ‘ordinary’ before watercourse to distinguish them in terms of size and responsibility.- The LLFA would recommend adding that watercourses should remain open channel wherever possible.- The LLFA is pleased to see the inclusion of advice in relation to site topography and Suds, we would recommend adding ‘overland flow routes’ and the removal of ‘attenuation ponds’ to read ‘This needs to be factored into the development when considering flood risk, overland flow routing and suitable locations for sustainable drainage’. We would ask for this change as sustainable drainage is not limited to pond features and the LLFA would encourage the use of multiple types of features to mimic best practice.
02	Page 107- Other Open Space and Green Corridors	<ul style="list-style-type: none">- The LLFA is pleased to see the inclusion of ‘well designed SuDs’ in this section of the development brief.- The LLFA would add that green corridors should be formed around existing watercourses, and ensure that existing watercourses remain open channel to provide water quantity, quality, amenity and biodiversity benefits.
03	Page 108 - Sustainable Drainage	<ul style="list-style-type: none">- A service level agreement between WCC FRM and WDC is not currently in place for the checking of SuDS. Although a trial is currently underway, and early discussions have taken place, we feel that this line should be amended to ensure that developers looking at the guidance document for advice are not mis-lead. The LLFA would suggest the following wording is introduced ‘Prior to adoption, an additional review of the design and construction of SuDS features will be undertaken by ourselves or specialist partners to ensure they are in accordance with the approved design.’- The section should highlight that any proposed SuDs features should be designed in accordance with best practice inclusive of the Suds manual CIRIA C753 and adhere to the LLFA’s Standing Advice document.- Discharge rates must adhere to the WDC Local Plan policies. The downstream village of Ashow has experienced flooding, this must be mitigated by ensuring flows off-site are in accordance with local plan policies.- Multiple SuDs features to provide maximum surface water treatment should be encouraged and to ensure permanent standing water is kept to a reasonable depth, by spreading attenuation volume through source and site control features.- Existing catchments should be maintained to ensure discharge is not moved cross-catchment, creating flooding or water supply issues to receiving watercourses. Cross-catchment discharge would be a concern on this site if the relevant landowners create small disconnected networks, as outlined at the start of the section.

		<ul style="list-style-type: none"> - Provide amenity etc benefit in addition to mitigating flood risk – that is the main one.
04	Page 115 - Flood Risk	<ul style="list-style-type: none"> - Although the development is shown to be in Flood Zone 1, the national scale mapping only denotes flood zones for watercourses with larger than a 3km catchment. Proportionate modelling has been requested through pre-app advice to the applicant for the allocation for H40 to determine the flood zones for the ordinary watercourse within this allocation. - The two on site watercourses will require maintenance easements in accordance with the LLFA Standing Advice to ensure that access is available to clear blockages and undertake maintenance once the development has been completed. - Any Construction Environmental Management Plan (CEMP) should include measures to control siltation and pollution to the downstream watercourse to mitigate an increase in flood risk due to siltation of the culverts crossing under the A46, and to protect water quality of the downstream Local Nature Reserve. - Any alterations, temporary or permanent, should not be made to the onsite watercourses without obtaining Ordinary Watercourse Land Drainage consent from WCC as LLFA first.
05	Page 147 – Sustainable Drainage	<ul style="list-style-type: none"> - The LLFA does not consider oversized pipes as Sustainable Drainage and would not accept them as Suds if submitted during the planning process. We would recommend this is removed and the sentence reworded to the following ‘Typically this will include both source control features such as permeable surfaces, conveyance features such as swales and site control features such as attenuation ponds to create a management train for surface water on the development site.’
05		<ul style="list-style-type: none"> -