

To:	Head of Planning Services Exeter City Council Civic Centre Paris Street Exeter EX1 1JN	From:	Flood and Coastal Risk Management Team Lucombe House County Hall Topsham Road Exeter EX2 4QD
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Date: 19 April 2018
Our Ref: FRM/EC/0368/2018

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PLANNING APPLICATION - LEAD LOCAL FLOOD AUTHORITY RESPONSE

APPLICATION NUMBER: 18/0368/OUT

APPLICANT:

DETAILS OF APPLICATION: Outline application for the demolition of existing structures, site remediation and redevelopment to provide Classes A1 (retail), A3 (Cafes and Restaurants), associated access, internal circulation, service yards, parking, landscaping, public realm works, infrastructure and dedication of land for improvements to Honiton Road (all matters reserved except access).

LOCATION: Site Address: WPD Depot, Moor Lane, Exeter, Devon, EX2 7JF

Recommendation:

At this stage, we object to this planning application because we do not believe that it satisfactorily conforms to Policy CP12 (Flood Risk) of Exeter City Council's Core Strategy (2012) which requires all developments to mitigate against flood risk and utilise sustainable drainage systems, where feasible and practical. The applicant will therefore be required to submit additional information in order to demonstrate that all aspects of the proposed surface water drainage management system have been considered.

Observations:

It is acknowledged that an urban factor was used during the calculation of the greenfield runoff rates, in Appendix C and Section 6.3.6 of the Flood Risk Assessment dated February 2018, which mimics the existing scenario at the site. However, in line with our SUDS guidance, where brownfield sites are being developed, peak flow control should still be based on the greenfield runoff rate (with no urban factor). The applicant must therefore attempt to match this greenfield rate in the first instance, but if this is robustly demonstrated to be unfeasible, the applicant should work backwards to achieve a runoff rate as close to the greenfield conditions as possible. Importantly, the applicant will be required to provide evidence of the calculations undertaken to achieve the proposed runoff rate.

Underground systems cannot be considered as truly sustainable means of drainage because they do not provide the required water quality, public amenity and biodiversity benefits, which are some of the underpinning principles of SuDS. Consequently, above-ground SuDS components should be utilised unless the applicant can robustly demonstrate that they are not feasible; in almost all cases, above- and below-ground components can be used in combination where development area is limited.

An ordinary watercourse runs through this site, so if any temporary or permanent works need to take place within this watercourse to facilitate the proposed development (such as an access culvert or bridge), Land Drainage Consent must be obtained from Devon County Council's Flood and Coastal Risk Management Team prior to any works commencing. Details of this procedure can be found at: <https://new.devon.gov.uk/floodriskmanagement/land-drainage-consent/>.

It is recommended that further infiltration testing and groundwater monitoring is carried out to determine the viability of permeable surfacing at the site.

Yours Faithfully

Helen Montgomery
Flood and Coastal Risk Engineer