From:
Sent: 25/05/2017 11:02:12
To:
Subject: FW: Response To Application Number 17/0665/01 at Sandy Park Lodge (formerly Primrose Orchard), Old Rydon Lane, Exeter, EX2 7JP
Attachments: Response_17-0665-01.pdf

From: Richard Rainbow [mailto:Richard.Rainbow@devon.gov.uk]
Sent: 24 May 2017 14:46
To: Llewellyn, John <john.llewellyn@exeter.gov.uk>
Subject: Response To Application Number 17/0665/01 at Sandy Park Lodge (formerly Primrose Orchard), Old Rydon Lane, Exeter, EX2 7JP

Please find attached Devon County Council's Consultation Response for the above planning application/ consultation.

Regards

Richard Rainbow
Flood and Coastal Risk Engineer
Flood Risk Management, Environment Group

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Devon County Council

Planning, Transportation and Environment

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
Date:	24 May 2017	**LLFA Officer:**	Richard Rainbow
Our Ref:	FRM/ECC/0661/2017	**Telephone:**	01392383000
		E-mail:	floodrisk@devon.gov.uk

PLANNING APPLICATION - LEAD LOCAL FLOOD AUTHORITY RESPONSE

APPLICATION NUMBER:	**17/0665/01**
APPLICANT:	**Exeter Rugby Group PLC**
DETAILS OF APPLICATION:	**Demolition of Existing Bungalow to allow construction of New Hotel with up to 250 Bedrooms and associated facilities including new pedestrian foot Bridge link as main entrance at high level via Sandy Park Stadium Car Park. (Outline application with all matters reserved).**
LOCATION:	**Sandy Park Lodge (formerly Primrose Orchard), Old Rydon Lane, Exeter, EX2 7JP**

Recommendation:

Although we have no in-principle objection to the above planning application at this stage, the applicant must submit additional information, as outlined below, in order to demonstrate that all aspects of the proposed surface water drainage management system have been considered.

Observations:

The applicant should provide a scaled plan to identify that there is sufficient space to locate the proposed attenuation features within the proposed development area. It is noted that the strategy is proposing below ground attenuation, these 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. Indeed the submitted Design and Access statement highlights the area to the East for use of open attenuation features within the Green Infrastructure area therefore further consideration of this area is required.

The applicant should also note that in accordance with the SuDS Management Train, surface water should be managed at source in the first instance. The applicant will therefore be required to explore the use of a variety of above-ground source control components across the whole site to avoid managing all of the surface water from the proposed development at one concentrated point (e.g. a single attenuation pond).

Examples of these source control components could include permeable paving (which could be underdrained), formalised tree pits or other bioretention features such as rain gardens, as well as green roofs, swales and filter drains.

It is proposed to discharge to an existing motorway ditch to the eastern boundary of the site at Qbar, although the discharge rates are acceptable confirmation from Highways England should be obtained to confirm that they are happy to except a formalised discharge into their drainage network. The applicant should also provide a plan showing the ditch network connectivity to identify the final outfall location.

Yours Faithfully

Richard Rainbow
Flood and Coastal Risk Engineer