

Copeland Borough Council
Development Management
The Copeland Centre
Catherine Street
Whitehaven
CA28 7SJ

1st March 2023
Ref: K39225.002

LAND OFF FELL VIEW AVENUE AND WINDERMERE ROAD – 40 NEW DWELLINGS
CBC REF NO: 4/22/2359/0F1
RESPONSE TO CBC PLANNING DECISION NOTICE LETTER DATED 15th DECEMBER 2022
PRE-COMMENCEMENT CONDITION 3 -DRAINAGE

In reviewing the enclosed information, reference should be made to the latest revisions of the following RGP Reports and Drawings:

Reports:

- K39225.FRA-001A - Flood Risk Assessment & Drainage Strategy
- K39225.OM-002A - Operation & Maintenance Plan for SuDS

Drawings:

- K39225-105B-PROPOSED DRAINAGE PLAN 1 OF 4
- K39225-106B-PROPOSED DRAINAGE PLAN 2 OF 4
- K39225-107B-PROPOSED DRAINAGE PLAN 3 OF 4
- K39225-108B-PROPOSED DRAINAGE PLAN 4 OF 4
- K39225-200 LAND REGISTRY PLAN (Windermere Road)
- K39225-201 S185 AGREEMENT PLAN 1 OF 2 (Windermere Road)
- K39225-202 S185 AGREEMENT PLAN 2 OF 2 (Windermere Road)
- K39225-203 LAND REGISTRY PLAN (Fell View Avenue)
- K39225-204 S185 AGREEMENT PLAN 1 OF 2 (Fell View Avenue)
- K39225-205 S185 AGREEMENT PLAN 1 OF 2 (Fell View Avenue)

Copeland Borough Council Pre-commencement Condition – Drainage:

3. Prior to commencement, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage scheme must include:

- (i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;
- (ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);
- (iii) Levels of the proposed drainage scheme including proposed ground and finished floor levels in AOD;

- (iv) Incorporate mitigation measures to manage the risk of sewer surcharge where applicable; and
- (v) Foul and surface water shall drain on separate systems.

RGP Response to Pre-commencement Conditions:

We have reviewed the pre-commencement conditions for the drainage and provide the following updated response:

- (i) An investigation of the hierarchy of drainage options in line with NPPG has been carried out and has been detailed in Section 10 of the Flood Risk Assessment and Drainage Strategy Report K39225.FRA-001A as previously submitted in support of the Planning Application.
- (ii) A restricted rate of discharge has been calculated and has been detailed in Section 10 of the Flood Risk Assessment and Drainage Strategy Report K39225.FRA-001A.

The overall cumulative discharge has been restricted to match the existing Greenfield runoff rate for the site of 5.8 l/s. This has been subdivided to control flows from 3 No. Attenuation Tanks with Plots 1-22 (Fell View Avenue) restricted to 2.9 l/s. With the Windermere Road Plots 23-28 restricted to 1.1 l/s and Plots 29 - 40 restricted to 1.8 l/s.

- (iii) Cover and Invert Levels of the proposed drainage scheme including proposed ground and finished floor levels are included on Drawing Nos. 105B to 108B inclusive.

Cover and Invert Levels of the proposed sewer diversion are included on the S185 Agreement drawings 200 to 205 inclusive.

- (iv) Section 10.9 of the Flood Risk Assessment and Drainage Strategy Report K39225.FRA-001A provides information on designing for local drainage system failure. No additional specific mitigation measures are required for the private drainage and the drainage calculations and drawings have been updated to include the increased size of attenuation storage allowance for 50% climate change.

A SuDS Operation and Maintenance Plan K39225.OM-002A has also been issued to ensure the private SuDS are maintained and operate efficiently reducing the risk of blockage /surcharging.

A thorough drainage investigation including CCTV survey of the existing public sewers in the vicinity has been carried out. This identified some issues with the existing network and the information has been passed to United Utilities who are scheduling maintenance and repairs in the areas to ensure their sewers are operating efficiently in the locality.

No mitigation measures are applicable for the proposed sewer diversion as cover levels and ground levels are being raised. An S185 Application has been submitted to United Utilities and we are currently seeking Technical Approval.

The existing route and proposed diversion of the public combined sewer is located at the rear of the properties at a level significantly lower than the plot FFL's and as such all private wastewater connections will require a final steep gradient or backdrop lateral connection to the public sewer and there is no risk of sewer surcharge affecting the properties.

A non-return flap valve has been specified for the surface water connection to the public SW sewer on the outlet from the lowest attenuation tank on Fell View Avenue as a safeguarding measure.

- (v) Foul and surface water drainage will be on separate systems. See Drawing Nos. 105B to 108B inclusive for reference.

Yours sincerely

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Engineer
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