

Copeland area Planning Department
Cumberland Council

24th October 2024

Ref: K41128.002

For the attention of Sarah Papaleo

Dear Sarah,

LAND BETWEEN GRIFFIN CLOSE AND GREENVALE COURT, FRIZINGTON

CC REF NO: 4/24/2252/0F1

RESPONSE TO UU LETTER DATED 29th AUGUST 2024

UU REF NO: DC/24/1881

With reference to UU's response included below for information:

"DRAINAGE - REQUEST FOR ADDITIONAL INFORMATION

Following our review of the submitted Flood Risk Assessment & Drainage Strategy (ref K41128.FRA/001, dated 28th June 2024), the proposals are NOT acceptable to United Utilities.

This is because we have not seen robust evidence that the drainage hierarchy has been thoroughly investigated. We also request that the applicant confirms where the nearby unchartered foul and surface pipes discharge to. A suitable point of discharge is required to ensure a new low spot on the network is created. The risk of sewer surcharge should be carefully considered including the risk of overland flow arising from sewer surcharge from existing and proposed sewers. It is our recommendation that the above information is provided prior to determination".

We have reviewed the response from UU and have addressed the requests for additional information within the below report revision:

Reports:

- K41128.FRA-001A - Flood Risk Assessment & Drainage Strategy, dated 24/10/24

We have specifically addressed the UU comments within the body of the report, but for the avoidance of doubt draw your attention to the following responses:

- **Drainage hierarchy** – the drainage hierarchy has been thoroughly investigated, additional percolation testing has been undertaken during the latest round of ground investigations, proving infiltration is not a viable option for surface water disposal at this site.
 - See Section 2.9 of the above referenced report.
- **Confirmation of uncharted foul and surface water pipe discharge points** – further CCTV drainage investigation has been undertaken by SK Drainage Solutions which has confirmed the existing foul and surface water pipes continue on separate systems. The investigations confirmed the surface water pipe continues north westerly and discharges to Lingla Beck. The private foul system was found to connect into the existing combined public sewer recorded on UU records towards the rear of 'The Laurel' residences
 - See section 2.7 and Appendix D of the report for further information.
- **Suitable point of discharge** – Discharge from the development would be via the existing former care home private sewer connections and new discharge points are not required.
 - See Section 6 of the report for reference.

- **Risk of sewer surcharge and overland flows** – The proposed development surface water drainage system has been designed to accommodate a 100yr + 50% climate change event with discharge controlled to match the equivalent greenfield runoff rate. The risk of surcharge from the development would be very low, however in the highly unlikely event of the occurrence of overland flows contingency measures have been included for mitigation
 - See Section 4.9 which provides information on designing for local drainage system failure.

Responsibility for the existing sewers outside the development boundary would fall with the riparian owners, however the control of flows from the proposed development would be a significant improvement on that of the former site occupancy whereby the former care home had significantly more occupants and a large impermeable footprint with unattenuated surface water discharge to the same sewer networks, therefore the existing sewer networks should comfortably be able to accommodate the proposed reduced discharges from the development area without being adversely affected.

- Refer to Section 4.4 for further explanation.

Although outside the control of the development, it should be noted that the majority of the off-site pipe network is routed through greenspace and in the unlikely event of sewer surcharge leading to overland flows it would be highly unlikely that any existing dwellings would be directly impacted.

We trust this information satisfies UU's request for additional information and that no pre-commencement conditions are now required as a result.

Yours sincerely

C Abram BEng (Hons) GMICE, CIWEM Environmental Partner
Senior Engineer
R G Parkins & Partners Ltd