

Apologies, amended letter attached.

Kat Goodyear

Development & Flood Risk Manager
Flood and Water Management

Essex County Council

Telephone: 03330 136738 | **Mobile:** 07788 303698

Email: kathryn.goodyear@essex.gov.uk | www.essex.gov.uk

P Please consider the environment before printing this e-mail

From: Kathryn Goodyear, SUDS Approval Body Manager

Sent: 07 July 2015 10:28

To: Rochford

Subject: FW: Consultation on a Planning Proposal

Good morning,

Please see below response previously sent in respect of this application. We were subsequently consulted on a revised version of the FRA but, having seen the Environment Agency comments who were statutory consultee at the time, said we supported their comments hence the FRA addendum now submitted contains this latter consultation response.

However, we do still have the following concerns, therefore I have outlined this in the attached consultation response.

Kind regards,

Kat Goodyear

Development & Flood Risk Manager
Flood and Water Management

Essex County Council

Telephone: 03330 136738 | **Mobile:** 07788 303698

Email: kathryn.goodyear@essex.gov.uk | www.essex.gov.uk

P Please consider the environment before printing this e-mail

From: Suds

Sent: 09 September 2014 11:36

To: planning.applications@rochford.gov.uk

Subject: FW: Consultation on a Planning Proposal

FAO Katie Rodgers

Good morning,

Consultation Response– 14/00627/OUT– Land North Of London Road and South of Rawreth Lane and West of Rawreth Industrial Estate, Rawreth Lane, Rayleigh, Essex

Thank you for giving us the opportunity to view and comment on the proposed surface water drainage strategy for this planning application in respect of land north of London Road, Rayleigh.

Until we become the SuDS Approval Body (SAB), expected to be in 2015, we are providing informal comments on SuDS schemes on sites over 1ha, which are given without prejudice to any future application under the Flood and Water Management Act. The Environment Agency remains the statutory consultee on surface water.

We would ideally look for SuDS to comply with:

- The CIRIA SuDS Manual (C697)
- Defra's draft SuDS National Standards
- Essex County Council's (ECC's) emerging Sustainable Drainage Design and Adoption Guide

to keep open the possibility of Essex County Council as the future SAB being able to adopt them. This will, however, be subject to any future Voluntary Adoption Policy developed and full and clear evidence that SuDS meet the relevant criteria would be expected to be provided.

Having reviewed the flood risk assessment, our comments on the surface water drainage strategy are as follows:

- 2.4.1- A plan showing the geology of the site should be provided, to support the statements that infiltration will not be possible. Ideally infiltration tests should also be carried out which may be done at the detailed stage.
- 4.4.6- Some of the flows from the southern extent of Roc2 along Rawreth Lane may also impact the site- these should be mentioned here because whilst the predominant flow path is to the north, surface water flooding to the highway and potentially properties is known to occur in this location.
- 5.3.8- The ECC SuDS Design & Adoption Guide seeks a reduction during the 1 in 100 year event to the 1 in 1 year greenfield rate if possible. If evidence can be provided that this is not feasible we would then seek a reduction to the extent considered feasible. This will not become formal policy until ECC becomes the SAB.
- 5.3.10- The allowable runoff rate should not include the 30% allowance for climate change as the idea is to mitigate against the effect of this i.e. by limiting to just the 1 in 100 year event. Otherwise runoff is being allowed at the future rate i.e. higher than occurs at present, which could potentially cause a surface

water flood risk. This would then increase the storage requirements as the storage must be designed to deal with the volumes generated during a 1 in 100 plus 30% CC event. Furthermore, a conservative approach could be taken whereby, as mentioned above, runoff rates are limited to the 1 in 1 year rate to calculate the maximum possible storage requirement to see if this can feasibly be provided on the site.

- 6.1.5- The NPPF technical guidance contains the recommended precautionary sensitivity range for climate change of 30% for this type of development, but the NPPF does not specify that runoff should be allowed at the 1 in 100 year rate and this would be at odds with EA and ECC policy, the former of which requires runoff to be restricted to equivalent rates for the 1 in 1 and 1 in 100 year events, and the latter which requires runoff for up to a 1 in 100 year event to be restricted to the 1 in 1 year rate.
- Appendix C- In order to show that the surface water drainage strategy is deliverable, the applicant should demonstrate that the required space can be set aside for the required storage identified in the FRA. The width of the swale indicated on the 'main road typical cross section' on the constraints plan of 2m would only provide 0.3 cubic metres of storage per metre length if recommended side slopes of 1 in 3 are used. Typical widths are in the region of 4-5m to ensure sufficient storage of road drainage is provided. This can be developed further at the detailed stage but we wanted to flag this up now as it may impact on available space

Whilst we have no further comments to make at this stage, attached is a standing advice note explaining the implications of Schedule 3 of the Flood & Water Management Act. We look forward to being consulted at subsequent planning stages.

Kind regards,

Kat

Kat Goodyear

SuDS Approving Body Manager
Flood and Water Management

Essex County Council

Telephone: 03330 136738 | **Mobile:** 077388 303698

Email: kathryn.goodyear@essex.gov.uk | www.essex.gov.uk

P Please consider the environment before printing this e-mail

From: Holli Fielden [<mailto:Holli.Fielden@Rochford.gov.uk>]

Sent: 05 September 2014 14:10

To: Kathryn Goodyear, SUDS Approval Body Manager

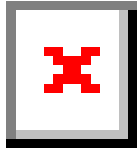
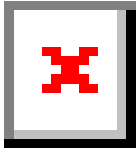
Subject: Consultation on a Planning Proposal

Good afternoon,

Please find attached a consultation letter regarding planning application reference 14/00627/OUT – Land North of London Road and South of Rawreth Lane and West of Rawreth Industrial Estate, Rawreth Lane, Rayleigh.

Please do not hesitate to contact me if you require further assistance.

Kind regards,
Holli Fielden
Customer Services Officer
Customer Services (Planning and Community)
Rochford District Council
01702 318 191
<http://www.rochford.gov.uk>



Our Vision is to make Rochford District a place which provides opportunities for the best possible quality of life for all who live, work and visit here.

This email (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person unless express permission is given. If you are not a named recipient, please contact the sender and delete the email from your system. It is the recipient's responsibility to ensure that appropriate measures are in place to check for software viruses.

This email (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person unless express permission is given. If you are not a named recipient, please contact the sender and delete the email from your system. It is the recipient's responsibility to ensure that appropriate measures are in place to check for software viruses.