

Date: 25/07/2018
Comments from: Drainage
Re: SCO/2018/1773

No Comments	
No Objection	
No Objection Subject to Conditions	
Objection	
Further information Requested	

Comments
<p>In paragraph 5.2.5 it is stated consultation with the Lead Local Flood Authority (Coventry City Council) will take place. This constitutes pre-application advice. Standing advice and information on our Pre-application service is available here: http://www.coventry.gov.uk/info/70/water_management_and_flooding/3153/pre-application_planning_advice/1</p> <p>In paragraph 5.2.11 it is stated the proposed development is located in Flood Zone 1, which is correct. The fluvial flood maps do not extend to the site because the upstream catchment is not greater than 3km². Therefore the site may still be at risk of flooding from the Hall Brook.</p> <p>Regarding the construction phase (5.2.15 and 5.2.16), for reference the following conditions are likely to be placed on any application:</p> <ul style="list-style-type: none"> • Provisions must be made for the drainage of the site to ensure there are no temporary increases in flood risk, on or off site, during the construction phase. • Provisions must be made to ensure there is no increase in sediment loads and other pollutants within the surface water runoff, on or off site, during the construction phase. <p>Another similar condition for consideration:</p> <p>Provisions must be made for the drainage of the site to ensure there is no discharge of surface water to the Public Highway.</p> <p>The EIA should consider these requirements.</p> <p>5.2.20 Any soakaway tests should be undertaken in accordance with BRE 365 standards.</p> <p>5.2.2 The Development Concept Plan SK011 – Rev A submitted for SCR/2018/0456 shows what appear to be attenuation ponds located near to the Hall Brook. Please note it should be demonstrated that these are located outside of anticipated flood extents.</p> <p>The report does not mention the Water Framework Directive</p> <p>The Hall Brook, an ordinary watercourse, flows through the site. Although not classified for ecological value, please note the following. The Brook is part of the Water Framework Directive (WFD) water body GB109054044660 (Sowe – confluence of Breach Brook to confluence of Withy Brook). This water body currently has a Overall WFD classification of Poor (2016), including a Poor Ecological classification; the target classification assigned by the Severn River Basin Management Plan (regional) is Moderate by 2027. Additionally, the Coventry Brooks and rivers are described as a priority Sub-catchment area in the Warwickshire Avon Catchment Plan (p7)(regional). Therefore the development should not impact negatively upon the water quality and value to biodiversity of the Hall Brook. In fact, there is a strong case for environmental enhancement of the Hall Brook through the development.</p>

The land uses of the proposed development could decrease the quality of water discharging to the Hall Brook. This can be mitigated if appropriately designed Sustainable Drainage Systems (SuDS) provide on-site water treatment in a SuDS management train.

As well as protecting the Hall Brook's existing environmental value, there is also opportunity for improvements through river restoration. See Local Plan policy EM4 (2c): "all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged".

The Environmental Impact Assessment should therefore include detailed analysis of the impacts of the development upon the water quality of the Hall Brook, with Consideration for the Water Framework Directive requirements. Local Plan policies EM4 & 5 should also be considered.

Further information (if any)

Amendments Recommended (if any)

Conditions Recommended (if any)

Please email response to planning@coventry.gov.uk