

Statement of Common Ground (SoCG)

DC/19/1499/FUL Garden Square, Rendlesham

1. On 15th April 2019, Suffolk County Council (SCC), Flood & Water Management as Lead Local Flood Authority (LLFA) were consulted on application DC/19/1499/FUL.
2. DC/19/1499/FUL is an application for the construction of 75 dwellings.
3. On 29th April 2019, SCC LLFA submitted a holding objection in respect of this application. This is available to view on the District Council's website with an upload date of 29th April 2019.
4. The holding objection centred around the proposed surface water drainage strategy which sought to utilise deep infiltration.
5. An FRA Addendum was issued to SCC LLFA on 9th May 2019. This is available to view on the District Council's website with an upload date of 9th May 2019.
6. The FRA Addendum sets out two options for surface water drainage disposal.
 - a. Option 1 – Disposal of surface water to Anglian Water surface water sewer with attenuation in a crated system below the proposed carriageways.
 - b. Option 2 – Disposal of surface water to Anglian Water surface water sewer with attenuation in a crated system below the public open space in the north east corner of the site.
7. SCC LLFA does not encourage the use of crated systems below carriageways. The reasoning behind this is that crated systems only have a design life of 40 years. When these require replacement, this would necessitate deep excavation of roads which would cause significant disruption. There is an inherent risk of crate failure if they are not maintained properly or are not replaced at the end of their serviceable life which presents a risk to road users if located in trafficked areas.
8. As such, Option 2 from the FRA Addendum referenced above, with surface water attenuation being located in the public open space in the north east corner of the site with a single discharge to the Anglian Water sewer is the only acceptable option to SCC LLFA.
9. Due to the only acceptable surface water drainage strategy having a single point of attenuation, this would need to be constructed at an early phase. This needs to be made clear in any phasing plan.

10. Providing the principle is agreed that surface water would be disposed of using a crated surface water attenuation system (with a restricted outflow as agreed by Anglian Water) located in the open space in the north east corner of the site, delivered entirely as part of Phase 1, SCC LLFA would be agreeable to any remaining details to be submitted as part of a discharge of conditions application, as recommended in our formal consultation response dated 6th June 2019. The correspondence relating to the recommendation is included in Appendix A & B of this document. Appendix A confirms acceptance subject to conditions and refers back to a response submitted for DC/18/2374/FUL for specific conditions. Appendix B contains the response submitted for DC/18/2374/FUL containing the aforementioned conditions.

Matt Williams
Flood & Water Engineer
Suffolk County Council, Flood & Water Management, Lead Local Flood Authority
2nd March 2020

Letter signed by:



On behalf of the Appellant Capital
Community Developments Ltd.

02/03/2020

Appendix A – LLFA consultation response to DC/19/1499/FUL dated 6th June 2019

Matt Williams

From: Matt Williams
Sent: 06 June 2019 16:18
To: Jane Rodens
Subject: RE: Land north of garden Square - Rendlesham - FRA addendum A
Attachments: 2018-07-16 MW Reply Land to the North and West of Garden Square and Gardenia Close, Rendlesham Ref DC/18/2374/FUL

Hi Jane,

I've just had a quick flick through.

I'm not very keen on them infiltrating surface water on this site for a variety of reasons. The document provided by the applicant on 09/05 demonstrates that surface water could be contained on site before being discharged into the AW surface water sewer at a controlled rate.

Therefore, I would have no objection and would recommend the same conditions as for 18/2374 (attached) which allows for full details to be provided as part of a DoC application.

Kind regards, Matt

Matt Williams
Flood & Water Engineer
Flood & Water Management
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX
T: 01473 341490 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 06 June 2019 15:42
To: Matt Williams <Matt.Williams2@suffolk.gov.uk>
Subject: RE: Land north of garden Square - Rendlesham - FRA addendum A

Hello,

We are looking to refuse this application, and will not be officially re-consulting on the whole application again to all parties.

Would it be possible to let me know if you have any comments on the additional information that has been sent.

Thank you

Jane

From: Matt Williams [<mailto:Matt.Williams2@suffolk.gov.uk>]
Sent: 15 May 2019 10:19
To: steven@parkerplanningservices.co.uk; Jane Rodens
Subject: RE: Land north of garden Square - Rendlesham - FRA addendum A

Thanks Steven,

Jane – If you haven't already, could you re-consult me on this application with the updated FRA. I'm pretty snowed under at the moment so won't get a chance to review this informally, strictly working to deadlines at the moment!

Kind regards, Matt

Matt Williams
Flood & Water Engineer
Flood & Water Management
Growth, Highways & Infrastructure

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 09 May 2019 16:32

To: Matt Williams <Matt.Williams2@suffolk.gov.uk>

Cc: 'Jane Rodens' <Jane.Rodens@eastsoffolk.gov.uk>

Subject: FW: Land north of garden Square - Rendlesham - FRA addendum A

Good afternoon Matt,

We have reviewed your consultation response to our planning application DC/19/1499 in Rendlesham and our flood risk consultant has prepared the following in response. I trust it responds to your points and you can lift the holding objection.

I have copied the planning officer in but emailed it direct to you for expedience.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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From: Leigh Parratt <Leigh@amazi.co.uk>
Sent: 08 May 2019 15:06
Subject: Land north of garden Square - Rendlesham - FRA addendum A

Afternoon,

I have produced the attached document that may be issued to SCC (via the planners).

It provides SCC with confirmation that the site can be drained to sewer with no change to the submitted site layout. It also confirms that the currently proposed option of infiltration will be pursued and only ruled out if it cannot be agreed with the Environment Agency, or further SI reveals that it becomes impracticable.

Regards
Leigh Parratt

amazi

Civil Engineers – flood risk, drainage and hydraulics

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Appendix B – LLFA consultation response to DC/18/2374/FUL

Matt Williams

From: Matt Williams
Sent: 16 July 2018 09:59
To: d.c.admin@eastsuffolk.gov.uk
Subject: 2018-07-16 MW Reply Land to the North and West of Garden Square and Gardenia Close, Rendlesham Ref DC/18/2374/FUL

Dear Jane Rodens,

Subject: DC/18/2374/FUL, Land to the North and West of Garden Square and Gardenia Close, Rendlesham

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/2374/FUL

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

1. Amazi, Flood Risk Assessment, AMA647 Rev 0, 31/05/2018

We propose the following conditions in relation to surface water drainage for this application.

1. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

2. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. The dwellings hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

4. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

- a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act

Kind regards, Matt

Matt Williams

Flood & Water Engineer

Flood & Water Management

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