Answers to queries regarding FRA/SuDS Harrodian School

This revised FRA/SuDS Report (v1.1) has address the following issues raised by the Council:

Flood Risk

- Environment Agency raise no objections OK
- Finished Floor levels above 1 in 100 flood levels acceptable OK
- Flood Emergency Plan is required see LP 21 of the Local Plan A site-specific Flood Emergency Plan has been developed for the site which is included in Appendix D.
- Sequential Test can you please update the sequential test in the FRA to clarify why areas of the site with a lower flood risk are not appropriate for the building (this should consider wider planning matters not just flood risk i.e. MOL).

More information has been added under Sequential Test.

 Exception test – the FRA doesn't include a specific response to the 2 criteria set out in para 160 of the NPPF (presumably section 6 of the FRA covers criteria b) – can this please be provided.

More information has been added under Sequential Test.

Surface water runoff

• LP 21 requires greenfield runoff rates to be achieved where possible.

The outflow from the proposed storage system will be limited to 5 litres per second which is the permeable discharge rate of Thames Water.

- I've only had a quick scan but I am a little unclear from the submitted report of the following, perhaps your consultant could clarify?
 - Existing runoff rate ? The site in the existing condition is considered as a 'greenfield site'. The runoff rates (i.e. Greenfield Rates) have been estimated and provided in Table 12 of the report.
 - Greenfield runoff rate 0.87 l/s? Greenfield Rates are provided in Table 12 of the report.
 - Proposed runoff rate (with SuDS) 45 l/s?
 - Runoff rate post-development based on the land cover only (i.e. without the storage) is estimated as 47 litres/sec for the revised total area of 0.19ha. The proposed runoff rate is the controlled outfall discharge (into the Thames Water Surface Water sewer), which is 5 litres per second.
 - Attenuation pond not clear where the attenuation pond is can this
 please be clarified on the plans/FRA report –

The location of the proposed pond is shown in Appendix G of the report.

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- Need justification if greenfield rates are not being achieved, The storage is estimated for the maximum discharge rate from the 1 in 100 year plus 40% climate change. Greenfield Rates for the site are relatively low, which can not be achieved at the site as it requires extremely large storage capacity. There is no sufficient space to provide this storage within the site. Thames Water's allowable discharge rate of 5 litres per second has therefore been adopted.
- Has contact been made with Thames Water to confirm the discharge rate is acceptable (see LP 23 of the Local Plan)? It would be useful if you could confirm

An application for the Discharge Consent has been lodged with Thames Water which is currently under review. Thames Water's planning services are currently severely affected by the current Covid19 issues. We will be happy if you kindly put this as a condition.

 The drainage strategy does not appear to take into account the new changing room buildings – can this please be corrected/amended

The attenuation storage model (Appendices E, F, G) and all estimates/calculations and the drainage layout plan have been revised taking into account the area of the new changing room buildings.