Applicant Response to GLA (Water)

Planning Application Reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield, UB9 6PE

Post Stage 1 Comment (06/02/2025)	Applicant Response
The FRA does not adequately assess the risk of sewer flooding.	**The risk of sewer flooding has not been assessed at planning application stage, as there are no sewers located on the Site. It is a very bespoke site with regard to water resources. Condition No. 40 as currently drafted requires a Flood Risk Management Plan to be submitted to the Local Planning Authority for approval, prior to the commencement of development. This Condition also requires an assessment of the risk of sewer flooding, including final details of mitigation measures as appropriate – however there are no sewers on the site.**
The drainage strategy proposes to discharge runoff via infiltration, which is welcomed. However, groundwater records indicate shallow groundwater level (<1mbgl). The Applicant needs to confirm there is sufficient clearance (minimum 1m) from the bottom of the proposed infiltration system and maximum groundwater level encountered. Proposal to discharge rainwater runoff directly into concrete hardstanding to allow runoff to infiltrate through the cracks is not acceptable. The Applicant needs to provide positive/appropriate drainage route and	**As set out in the GLA response, the submitted Flood Risk Assessment acknowledges that there is the potential for groundwater flooding beneath the Site.** **Condition No. 40 as currently drafted requires a Flood Risk Management Plan to be submitted to the Local Planning Authority for approval, prior to the commencement of development. Part (b) of this Condition requires details of groundwater monitoring (with preference**

Note continued

discharge for the rainwater runoff. Where infiltration is proposed, the infiltration system needs to achieve half drain time within 24 hours.	**for monitoring during winter months), including final details of mitigation measures as appropriate.**
The drainage strategy proposes to provide attenuation within the proposed trench soakaways. The Applicant notes that the proposed infiltration systems cannot be designed to 3.3% or 1.0% AEP due to shallow groundwater. The Applicant should clearly show on plan location and extent of storage of exceeded flood volumes for the 3.3% AEP event and 1.0% AEP event including climate change demonstrating it can be safely contained. The plan should also demonstrate exceedance flow paths allowing flood volume to discharge back to lake.	**The details requested cannot be provided until detailed design stage, as the drainage strategy has not yet been finalised. Condition No. 41 as currently drafted requires a Sustainable Drainage Management Scheme to be submitted to the Local Planning Authority for approval, prior to the commencement of development.** **The submitted detailed drainage strategy will identify the proposed method and location of discharging collected surface water from the Site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). This strategy will also provide details relating to Sustainable Urban Drainage Systems (SUDS) and exceedance routes. At this stage, drainage calculations which demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm durations and rainfall intensities for the entire site area for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.**
The Site lies within SPZ1. Some of the pollution mitigation indices provided by the proposed SuDS is less than the pollution hazard indices. The Applicant should clearly demonstrate that sufficient mitigation is provided by the SuDS features for its associated catchment and land use in accordance with the CIRIA SuDS	**As above.**

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Manual C753. The Applicant should also be referring to Table 26.4 of the SuDS Manual when primary destination of runoff is to groundwater.	
In terms of SuDS, the drainage strategy proposes permeable paving and filter strips which is welcomed. Rainwater harvesting via water butts, green roof and rain gardens is proposed to be explored at next design stage. The Applicant should confirm measures of rainwater reuse and SuDS to manage runoff at source as part of the current design to ensure appropriate allowance has been made as part of the development proposal.	**As above.**
No information is provided as to the targeted Wat 01 credits for the non-residential uses on site.	**The details of the target WAT 01 credits cannot be provided until the detailed design stage, as the detailed drainage strategy has not yet been finalised. Condition No. 42 as currently drafted requires water infrastructure details to be submitted to the Local Planning Authority for approval, prior to the commencement of development. Part (i) requires the development to achieve at least a BREEAM excellent standard for the WAT 01 water category160 or equivalent.**