

**Our Ref: LE/2202380/LLFA/Rev01**

Christopher Brady  
Hillingdon Council  
Civic Centre  
High Street  
Uxbridge  
UB8 1UW.

29th November 2022

Dear Chris,

**RESPONSE TO LLFA COMMENTS (REF. 24843/APP/2022/2403 - LLFA Consultation response)**

Ardent Consulting Engineers (hereafter referred to as 'Ardent') have been commissioned by Bellway Homes Limited to address comments raised by Hillingdon Borough Council (HBC) as Lead Local Flood Authority (LLFA) on 19<sup>th</sup> October 2022 with respect to the proposed development at Former Comag Works, West Drayton, UB7 7QE. This follows the submission of a Flood Risk Assessment and drainage strategy in support of the planning application.

This letter aims to address the HBC LLFA comments. For ease of reference, the comments which are replicated below followed with an Ardent response immediately below.

***"Please can the applicant submit information which:***

- ***Demonstrates that rainwater harvesting techniques have been included or provide a sufficient justification for their non-inclusion***

In line with Policy SI 13 in the London Plan it is proposed that the rainwater downpipes are fitted with rainwater butts to provide rainwater harvesting techniques and betterment to the development site. These should be designed to overflow back into the drainage system, they will be installed on the mezzanine level (Refer to Drainage Strategy included in **Appendix A**). The locations of these rainwater butts are subject to the final drainage and landscape design.

- ***Confirms the method of flow control from the site.***

The proposed flow control method at the site is likely to be a Hydro-Brake vortex flow control device. However, this would be confirmed as part of the detailed design.

- ***Provides the runoff volume for the greenfield, existing and proposed rate for the 1 in 100-year 6 hour storm event.***

The difference in runoff volume has been calculated with the predevelopment site area (0.34ha) being classed as 100% permeable, and the post development site classes as 88% impermeable (0.30ha) accounting for the inclusion of green amenities. This is considered to be a worst case as the existing site is made up of recently demolished made ground and the permeability is in question. The long-term storage volume for the site, included in **Appendix B**, has been calculated to be 94.25m<sup>3</sup>. The required storage volume is provided within the proposed attenuation tank.

- ***Provides calculations to demonstrate that the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and on-site flow as a result of the 1 in 100 year event with a climate change consideration must be suitably managed (via suitable exceedance flow draining).***

An updated drainage drawing is included in **Appendix A**, including exceedance flow routes. Site levels would be designed to ensure that flows exceeding the capacity of the drainage network would flow away from building entrances and mimic existing flow routes as far as possible.

Calculations to demonstrate the site does not flood as a result of the 1 in 30 year and 1 in 100 year flood are included in **Appendix C**.

- ***Provides the name of the management company who will be in charge of the SuDS maintenance tasks.***

The name of the management company is not yet known, they will be appointed as the design progresses. If required, this could be provided as a planning condition.

- ***Provides evidence that Thames Water has approved the proposed discharge rate into their system."***

A pre-planning enquiry was submitted to Thames Water, a response was received confirming capacity in their network for foul water. Surface water confirmation has been provided subject to

justification for disposal of the surface water sewer over infiltration methods or to the adjacent watercourse. This is included in **Appendix D**.

We trust that the above and attached information is sufficient however, if you have any further queries, please do not hesitate to contact the undersigned.

Yours sincerely,

*L. Eaborn*

**Lauren Eaborn**  
**Graduate Consultant**

Approved by:

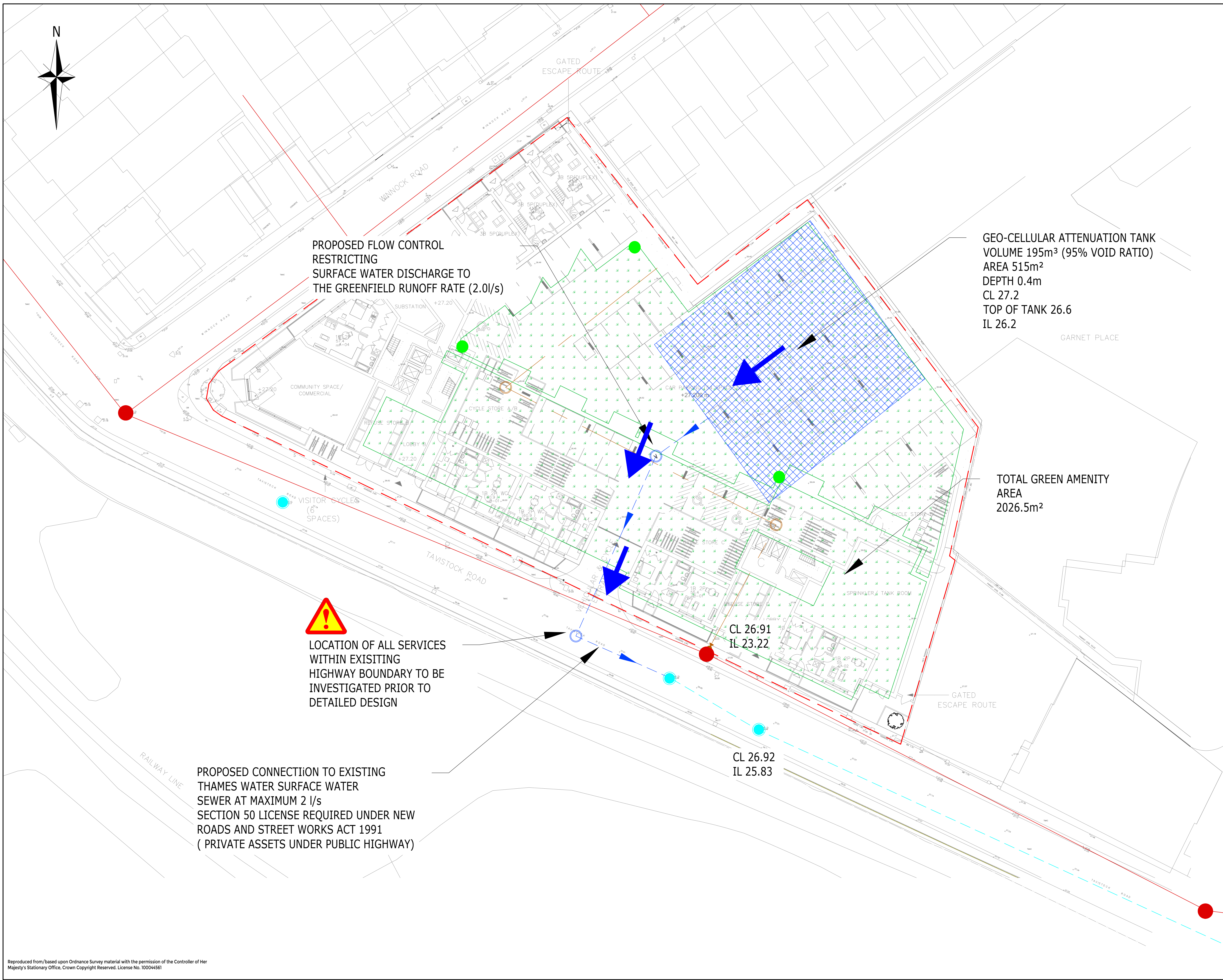
*C. Cooper*

**Charlie Cooper**  
**Associate**

Encl: Appendix A - 2200510-002 – Foul and Surface Water Drainage Strategy  
Appendix B - Long Term Storage Calculations  
Appendix C - 1 in 30 year and 1 in 100 year hydraulic calculation, model build  
Appendix D – Thames Water Pre-Planning Enquiry

## **Appendix A**





PROPOSED FLOW CONTROL  
RESTRICTING  
SURFACE WATER DISCHARGE TO  
THE GREENFIELD RUNOFF RATE (2.0l/s)

GEO-CELLULAR ATTENUATION TANK  
VOLUME 195m<sup>3</sup> (95% VOID RATIO)  
AREA 515m<sup>2</sup>  
DEPTH 0.4m  
CL 27.2  
TOP OF TANK 26.6  
IL 26.2

TOTAL GREEN AMENITY  
AREA  
2026.5m<sup>2</sup>



LOCATION OF ALL SERVICES  
WITHIN EXISTING  
HIGHWAY BOUNDARY TO BE  
INVESTIGATED PRIOR TO  
DETAILED DESIGN

PROPOSED CONNECTION TO EXISTING  
THAMES WATER SURFACE WATER  
SEWER AT MAXIMUM 2 l/s  
SECTION 50 LICENSE REQUIRED UNDER NEW  
ROADS AND STREET WORKS ACT 1991  
( PRIVATE ASSETS UNDER PUBLIC HIGHWAY)

- NOTES
1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RELEVANT SPECIFICATION AND ALL OTHER RELATED DRAWINGS ISSUED BY THE ENGINEER.
  2. DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
  3. ALL DIMENSIONS SHOWN ON THIS DRAWING ARE IN METRES, UNLESS OTHERWISE STATED. ALL LEVELS SHOWN ARE IN METRES ABOVE ORDNANCE DATUM.
  4. ALL DIMENSIONS, LEVELS AND SURVEY GRID CO-ORDINATES ARE TO BE CHECKED ON SITE AND THE ENGINEER NOTIFIED IMMEDIATELY OF ANY DISCREPANCIES PRIOR TO THE COMMENCEMENT OF THE WORKS.
  5. NO DEVIATION FROM THE DETAILS SHOWN ON THIS DRAWING IS PERMITTED WITHOUT PRIOR PERMISSION FROM THE ENGINEER.
  6. THIS DRAWING HAS BEEN BASED ON DRAWING No. "CWD-RMA-ZZ-00-DR-A-0100\_P1 Site Plan Ground Floor Level"
  7. EXISTING DRAINAGE AND UTILITIES TO BE CONFIRMED IN-SITU BY THE CONTRACTOR, PRIOR TO STARTING WORKS.
  8. THE DRAINAGE STRATEGY IS INDICATIVE ONLY, TO DEMONSTRATE DESIGN INTENT AND ATTENUATION STORAGE REQUIREMENTS.
  9. INDICATIVE DRAINAGE STRATEGY SUBJECT TO LONDON BOROUGH OF HILLINGDON (LEAD LOCAL FLOOD AUTHORITY) APPROVAL.
  10. STRATEGY SUBJECT TO CCTV SURVEY REQUIRED OF EXISTING DRAINAGE NETWORK TO CONFIRM LEVELS AND CONDITION.

- KEY
- INDICATIVE SITE BOUNDARY
  - PROPOSED SURFACE WATER SEWER
  - PROPOSED SURFACE WATER MANHOLE
  - PROPOSED FOUL WATER SEWER
  - PROPOSED FOUL MANHOLE
  - NON-RETURN VALVE
  - EXISTING THAMES WATER FOUL SEWER
  - EXISTING THAMES WATER SURFACE WATER SEWER
  - EXISTING THAMES WATER SURFACE WATER MANHOLE
  - PROPOSED GEOCELLULAR STORAGE (95% VOID RATIO)
  - PROPOSED GREEN AMENITY AREAS
  - INDICATIVE RAINWATER BUTT (SUBJECT TO FINAL LANDSCAPE DESIGN)
  - EXCEEDANCE FLOW ARROW

Rev	Description	Dwn	Chk	App	Date
<div><div>ARDENT</div><div>CONSULTING ENGINEERS</div><div>Third Floor The Hallmark Building 52-56 Leadenhall Street London EC3M 5JE Tel: 020 7680 4088 Web: <a href="http://www.ardent-ce.co.uk">www.ardent-ce.co.uk</a> E-mail: <a href="mailto:enquiries@ardent-ce.co.uk">enquiries@ardent-ce.co.uk</a></div><div><div>worksafe</div><div>consultant</div><div>www.smashtd.com</div><div>SSIP</div><div>MEMBER OF THE ASSOCIATION OF CONSULTANTS</div></div></div>					
Client					
BELLWAY HOMES LIMITED					
Project Title:					
COMAG WORKS, WEST DRAYTON					
Drawing Title:					
FOUL AND SURFACE WATER DRAINAGE STRATEGY					
A1 Scale	Date	Designed by			
1:200	22/07/22	LE			
Drawn by	Checked by	Approved by			
LE	CC	BC			
Drawing Number					Rev
2202380-007					-



## **Appendix B**

## Difference in Runoff Volume Following Development (i.e. Long Term Storage Volume)

This methodology is taken from *The SuDS Manual* (Ciria C753) and is also in accordance with the methods in *SC030219 Rainfall Runoff for Developments* and *BS 8582 Code of Practice for Surface Water Management for Development Sites*.

### The SuDS Manual Equation for greenfield development sites

$$Vol_{xs} = RD \times A \times 10 (0.8 - SPR) \frac{PIMP}{100}$$

### Calculation Inputs

<b>RD</b>	63	Rainfall depth during 1 in 100 year, 6hour storm event (taken from Figure A3.1 in 'Rainfall runoff management for developments') (mm)
<b>A</b>	0.34	Total area of site (ha)
<b>SPR</b>	0.3	Standard Percentage Runoff from greenfield site
<b>PIMP</b>	88	Percentage imperable area following development (%)

### Calculation Outputs

<b>Pre-development runoff volume</b>	<b>64.26</b>	m <sup>3</sup>	(assuming greenfield site)
<b>Post development runoff volume</b>	<b>158.51</b>	m <sup>3</sup>	
<b>Difference in Runoff Volume, Vol<sub>xs</sub> (i.e. Long Term Storage Volume)</b>	<b>94.25</b>	m <sup>3</sup>	

Where a development is found to increase the volume of runoff then the additional volume should be prevented from leaving the site (i.e. infiltration or rainwater harvesting). If this is not possible then the additional volume should be released at a very low rate (2 l/s/ha or less).


## **Appendix C**









Ardent Consulting Engineers		Page 4
Suite 207 One Alie Street London E1 8DE		
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Innovyze		Source Control 2020.1

Rainfall Details

Rainfall Model	FSR	Winter Storms	Yes
Return Period (years)	30	Cv (Summer)	0.750
Region	England and Wales	Cv (Winter)	0.840
M5-60 (mm)	20.000	Shortest Storm (mins)	15
Ratio R	0.400	Longest Storm (mins)	10080
Summer Storms	Yes	Climate Change %	+0


Time Area Diagram

Total Area (ha) 0.300

Time (mins)	Area	Time (mins)	Area	Time (mins)	Area
From: To:	(ha)	From: To:	(ha)	From: To:	(ha)
0 4	0.100	4 8	0.100	8 12	0.100

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Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
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Storm Event	Rain (mm/hr)	Flooded Volume (m <sup>3</sup> )	Discharge Volume (m <sup>3</sup> )	Time-Peak (mins)
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Time Area Diagram

Total Area (ha) 0.300

Time (mins)	Area	Time (mins)	Area	Time (mins)	Area
From: To:	(ha)	From: To:	(ha)	From: To:	(ha)
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## **Appendix D**





Miss. Lauren Eaborn  
Ardent Consulting Engineers  
The Hallmark Building  
London  
EC3M 5JE



19 July 2022

## Pre-planning enquiry: Confirmation of sufficient capacity

**Site address: Comag Tavistock Road West, Drayton, UB7 7QE**

Dear Mr. Ramos,

Thank you for providing information on your development. We have completed the assessment of the foul water flows and surface water run-off based on the information submitted in your application with the purpose of assessing sewerage capacity within the existing Thames Water sewer network.

Development details:

*Existing development: 1,655sqm of offices, and 1,020sqm of warehouse, foul discharge via gravity into existing manhole ref TQ05808101, existing surface water flows not confirmed.*

*Development proposal for 105 residential flats, proposed foul via gravity into existing manhole TQ05808101, proposed storm discharge attenuated to 2l/s for all storm events into existing surface water manhole ref TQ05808103.*

### Foul Water

If your proposals progress in line with the details you've provided, we're pleased to confirm that there will be sufficient sewerage capacity in the adjacent foul water sewer network to serve your development.

This confirmation is valid for 12 months or for the life of any planning approval that this information is used to support, to a maximum of three years.

**You'll need to keep us informed of any changes to your design – for example, an increase in the number or density of homes. Such changes could mean there is no longer sufficient capacity.**

## Surface Water

Please note that discharging surface water to the public sewer network should only be considered after all other methods of disposal have been investigated and proven to not be viable. In accordance with the Building Act 2000 Clause H3.3, positive connection to a public sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being: 1st Soakaways; 2nd Watercourses; 3rd Sewers.

Only when it can be proven that soakage into the ground or a connection into an adjacent watercourse is not possible would we consider a restricted discharge into the public surface water sewer network.

Thames Water Planning team would ask to see why it is not practicable on the site to restrict to Greenfield run-off rates if they are consulted as part of any planning application.

In considering your surface water needs, we support the use of sustainable drainage on development sites. You'll need to show the local authority and/or lead local flood authority how you've taken into account the surface water hierarchy that we've included.

## What happens next?

If you've any further questions, please contact me on 07747 640 273.

Yours sincerely

David Stamateris

Project Engineer

Thames Water