

24/00159/DISCON

Condition 6 Supporting Statement – LLFA Comments & Response 22.4.2024

LLFA comments as per the attached in GREEN.

Cora responses in BLUE

Section 6 of the Surface Water Drainage Strategy Report by ADC Infrastructure states that the strategy for managing surface water on site during the construction phase of the development will build and use the permanent drainage system. Drainage works will include the construction of the detention basin to provide attenuation, the construction of an outfall to the existing watercourse and the **construction of cut-off ditches on the downslope edge of any topsoil stripped areas to intercept run-off from stored material and bare earthwork surfaces and will direct run-off into the detention basin.**

There is no reference in the FRA to that highlighted in bold above.

Other than cut-off ditches, there appears to be no strategy outlined for sediment control and erosion control or any consideration of how this may impact on the final performance of the permanent drainage system. There is no mention of any actions or requirements for necessary protection measures or remedial works at the end of construction phase to ensure that the drainage system is restored to full intended working capacity. Maintenance information has been provided but appears to refer to when the site is complete and in occupation.

The proposed drainage networks benefit from STW technical approval and will be adopted by them post construction. As part of this adoption process STW require us to fully jet and clean the networks and undertake CCTV surveys of them to ensure that they are clear and in good works order. This occurs immediately post construction to allow them to be placed onto their 12 month maintenance periods and also at the conclusion of these periods. This will ensure that they are working to their full intended working capacities.

Section 3 of the Surface Water Drainage Strategy Report by ADC Infrastructure states that the site has a steep gradient which falls towards the northwest corner. There is a total level difference of 19m across the site which is significant and there is no mention of this specific constraint and how it will be managed within either document.

Measures are referenced within the CMS of how surface water will be managed through the construction phase. It is also referenced that the proposed roads and sewers will be the first things constructed as part of the development. Once these are constructed then the extent of the levels differences across the site will be reduced with the site essentially becoming 'tiered' with surface water from specific catchment areas being conveyed through the drainage networks, through the pond and discharging into the exiting ditch at the bottom of the site.

Section 7 of The Construction Method Statement by Cora outlines how surface water will be managed on site during construction. It refers to periods of heavy rainfall where surface water will follow the topography of the land. Whilst weather has been referenced elsewhere in the document, there has been no mention of flood risk controls for severe weather events.

Due to these significant falls across the site, excessive topsoil stripping is likely to have a significant impact on run-off with particular concern in relation to the transportation of suspended solids downstream.

The slip trench is proposed for this reason. Shown on plans.

The drainage and road network will be constructed first to drain the site using the proposed outfall that will serve the permanent drainage network. It states that measures will be taken to ensure there is no contaminated surface water run-off, liquids or solids which could harm the environment by being deposited onto the land or enabled to pass over. However, no measures have been specifically outlined so it is unclear how this will be managed.

The road gullies proposed as part of the approved S38 scheme are trapped pre-cast concrete gully pots, which are in accordance with Leicestershire County Council highways standard details. These allow sediment and contaminants to be filtered out from the surface water before continuing through the drainage networks. Once it has travelled through the drainage networks it enters the pond which also serves the same purpose.

A slip trench is proposed but no details or location have been provided.

Shown on the attached CMS Appendix A.

Details and location of proposed site excavations and details of areas to be used for the storage of substrate and soil.

Details for area to be used for storage of substrate and soil detailed on TMP.

Process for dewatering attenuation excavations. Will regular pumping or emptying of attenuation areas be necessary?

Dewatering above basic measure/extents not anticipated.

Construction site plan including compounds, material storage areas and temporary site parking.

Shown on the attached CMS Appendix A.

Pollution, water quality and emergency pollution control measures (including silt management). This should consider local watercourses within the vicinity of the site, existing flow routes, modified flow routes during construction and the identification of areas of potential erosion and sediment transfer and mitigation measures.

As referenced above. The measures proposed on the attached demonstrate this.

Flood risk controls for severe weather events. The site / project manager should sign up to receive Met Office weather warnings. The Plan should include details on alert level, definition, action & responsibility.

Considered N/A as the FRA states no risk to site or surrounding areas from flooding due to any potential sources.

Note: Where any construction works impact on an existing watercourse or ditch, consent under Section 23 of the Land Drainage Act 1991 will be required. Refer to standing advice note 2 below.

S23 consent attached.