

Good afternoon,

I write to you with regards to planning application DC/22/129789 – 21-57 Willow Way, Upper Sydenham, Forest Hill, London, SE26 4QP.

Please see below our review comments for the details submitted.

Review Summary

This application is proposing the following key items:

- Type of development: Major
- Flood risk: Low, Flood Zone 1
- Types of conveyance / attenuation features: Green roofs, permeable paving, attenuation tank.
- Runoff rate restriction (l/s): 2 l/s, this is greater than the greenfield rates, however provides significant betterment compared to the existing runoff rates. however within 3x greenfield rates .
- Runoff attenuation volume (m3): 159.6
- Maintenance plan: A maintenance plan has been provided, but with no tasks / frequencies for the green roofs. A maintenance owner has not been provided.

Recommendation and Requests

This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy. We object to the application for the following reasons:

- The applicant has not provided sufficient justification for the non-inclusion of rainwater harvesting techniques. The applicant should consider the use of water butts / raingardens.
- The applicant states on page 6 of the Surface Water Drainage Strategy Report that "Temporary storage will be provided within the attenuation tank to balance the volumes prior to discharge to the watercourse." However, elsewhere within the report, the proposed discharge is noted as being to the Thames Water combined sewer.
- The applicant states a proposed runoff rate of 2.0l/s in the 1 in 30-year storm. However, the calculations provided in Appendix H of the Surface Water Drainage Strategy Report show a discharge rate of 2.0l/s in the 1 in 30-year storm
- The applicant has not provided the greenfield runoff volume.
- The applicant has not clearly stated the proposed area and attenuation volume for each SuDS feature.
- The Surface Water Drainage Strategy Report lists a site area of 2,239m². However, the application form states an area of 7,251m².
- The drainage calculations only account for the impermeable area, and not the whole site area.

- The drainage calculations provided state that the “Half Drain Time has not been calculated as the structure is too full”. The applicant is required to provide a drawing showing exceedance flows.
- The maintenance strategy does not contain the maintenance tasks and strategies for the green roofs.
- A maintenance owner has not been stated.
- Thames Water has not been consulted regarding the proposed connection to the combined sewer.

To address the above, please can the applicant submit information which:

- Demonstrates that they have considered smaller scale rainwater harvesting features.
- Confirms whether the proposed surface water discharge is to a watercourse or combined sewer, with consideration given to the statement in page 6 of the Surface Water Drainage Strategy Report.
- Ensures the proposed runoff rates listed in the report align with those detailed in the calculations.
- Provides the greenfield runoff volume.
- Clearly states the proposed area and attenuation volume for each SuDS feature. Clarifies the site area for the proposed development. Includes the whole site area in the drainage calculations, as infiltration is not being pursued as a method of surface water discharge.
- Demonstrates updates to the drainage calculations (detailing the changes made) to ensure the half-drain times are reduced to less than 24 hours, to ensure that the proposed drainage strategy will remain operational in the case of consecutive storm events. Demonstrates where the exceedance flows are on a drawing.
- Provides the maintenance tasks and strategies for the green roofs.
- States a maintenance owner.
- Demonstrates that Thames Water has been consulted regarding the proposed connection to the combined sewer.

Please let me know if you have any questions regarding this application.

Kind regards,

Adam McCue
Flood Risk Officer
 Climate Resilience Team
 Inclusive Regeneration
 Lewisham Council