

# Consultation Response

**To:** Planning Services

**From:** Lead Local Flood Authority

**Date:** 23<sup>rd</sup> April 2019

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**Application number:** S/OUT/19/0582

**Proposal:** Outline Planning Application (means of access off Wanborough Road not reserved) for demolition and/or conversion of existing buildings and redevelopment to provide up to 2,500 homes (Use Class C3); up to 1,780 sqm of community/retail uses (Use Class D1/D2/A1/A3/A4); up to 2,500 sqm of employment use (Use Class B1); sports hub; playing pitches; 2no. 2 Form Entry primary schools; green infrastructure; indicative primary access road corridors to A420; improvements to Wanborough Road and associated works.

**Location:** Lotmead, New Eastern Villages, Swindon

## Recommendation – Objection

### Reasons for Objection

1. The Surface Water Management Strategy is not in-line with the Adopted SuDS Vision SPD and also the National Planning Practice Guidance as the proposed strategy does not give priority to Source control SuDS.
2. It has not been demonstrated that the development will not increase the risk of flooding elsewhere and therefore is contrary to Paragraph 155 of the National Planning Policy Framework (NPPF) and Policy EN6 of the adopted Swindon Local Plan 2026.

### Detailed Comments

The proposals have taken a huge step backwards from the Surface Water strategy plans that were provided as part of the previous applications. There seems to be a decrease in coverage of swales across the site, watercourses are not being shown to be retained and a number of deep attenuation features are shown within or adjacent to the flood plain which was the main objection the LLFA had on the previous proposals.

Our comments through the pre-app process have been ignored completely, the strategy continues to provide a solution based solely on underground surface water sewers to a site/regional control solution and priority is not being given to source control measures throughout the site.

Any applications coming forward must be in line with the adopted SuDS Vision SPD February 2017. Space must be allocated for shallow above ground conveyance features throughout the development, utilising the natural drainage routes and existing drainage features wherever possible which must be retained post development and priority must be given to source control measures to ensure that attenuation can be provided that will not be compromised by fluvial flood levels.

We recognise that the exact on plot source control measures cannot be provided at this stage but parameters need to be set for on plot requirements which then can be designed at the reserved matters stage.

The surface water management strategy needs to ensure that the detailed design of the ongoing phases of development utilise the natural drainage wherever possible and this needs to influence the detailed layouts, proposed ground levels etc. not the detailed layouts changing these natural routes and encouraging deeper drainage systems.

If above ground drainage features are not prioritised wherever possible and the conveyance is provided by underground systems which will not follow the natural flow paths then it will be difficult to achieve shallow attenuation features but if we can ensure space is allocated for shallower above ground conveyance features throughout the development and priority is given to source control measures, then this will ensure that attenuation can be provided above the 1 in 100 year plus climate change flood level.

It is also not clear if the existing watercourses will be retained post development. All existing watercourses must be clearly marked not only on the Surface Water Strategy plans but they also should be marked on the Green Infrastructure Parameter Plan. The existing watercourses can be used for conveyance to ensure the development mimics the natural drainage features of the site.

The strategy is showing proposed swales on the route of the existing watercourses which are to act as storage components as well as conveyance features. Whilst it may be feasible to utilise and enhance some of the existing watercourse sections to provide attenuation where they are not required for strategic flows, it is unlikely to be feasible for the majority of sections on the site.

Therefore we have concerns that consideration has not been given to the existing watercourses and their associated mature hedgerows which are shown to be retained on the Green Infrastructure Parameter Plan.

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