

Consultation Response

To: Planning Services
From: Lead Local Flood Authority
Date: 5th September 2022

Application number: S/COND/22/1184

Proposal: Discharge of condition 46 (Strategic Surface Water Management Scheme) from Outline Planning Permission S/OUT/19/0582

Location: Lotmead Site New Eastern Villages

Recommendation – Condition 46 not discharged

Reasons for Refusal

1. The Surface Water Management Strategy is not in-line with adopted guidance and policy such as the SuDS Vision SPD February 2017. The Strategy is also not inline with the National Planning Practice Guidance (Paragraph 079) as the proposed strategy does not give priority to SuDS throughout the development.
2. It has not been demonstrated that the development will not increase the risk of flooding elsewhere and therefore is contrary to Paragraph 159 of the National Planning Policy Framework (NPPF) and Policy EN6 of the adopted Swindon Local Plan 2026.

Detailed comments

The Hydrock Technical Design Note is not inline with the approved FRA Addendum (Ref: 27970/4003/TN001, Dated: 22/08/2019) produced by PBA/Stantec. The proposed strategy is based on large regional pond solutions rather than site and source control solutions which is not inline with local and national guidance.

The Hydrock Technical Design Note makes no reference to the main adopted guidance to the NEV, the SuDS Vision SPD, adopted February 2017. This must be adhered to and cannot be ignored.

We objected to the original strategy at the outline stage due to the proposals being based on very large ponds adjacent to the floodplain and a strategy promoting a more traditional pipe and gully scheme over Sustainable drainage features.

After several meetings and correspondence with the applicant's drainage consultant at the time, the strategy was amended to remove the reliance on the large ponds and set parameters for a number of catchments to ensure SuDS will be prioritised within the future parcels of the development. The LLFA removed its objection subject to conditions based on this strategy.

The new proposals have now reverted back to large ponds adjacent to the flood plain and no further changes have been made following the final plans submitted in the pre-planning application process which were not acceptable.

We have stated throughout the planning process that space must be made available for adequate source control SuDS and attenuation within the future parcels, as proposed within the FRA addendum and required by the SuDS Vision SPD.

The discussions had regarding the drainage throughout the pre-application meetings seem to have been ignored and the concerns raised have not been addressed. Although progress was made with Phase 1, the proposals have now been scaled right back and there is no commitment being set to delivering SuDS within the parcel.

A number of ditches are not shown on the drawings and these must be maintained. The key strategic network of existing ditches and proposed swales must be provided and the strategy must go further in discharging flows throughout the network rather than only a few discharge points via large ponds, to ensure the existing drainage regime is maintained inline with local and national guidance.

Parameters must be set to ensure a commitment is made to deliver SuDS within the parcels through the reserved matters applications.

The Parameters within the table on the approved outline Strategy were agreed but we mentioned in our final response on the outline that we expect some of the larger areas to be split down further. Unfortunately, this has gone the other way with a number of catchment areas increasing.

The notes on the approved outline Strategy drawing state;

"6. Adequate attenuation is to be provided within each catchment to meet allowable discharge rates; Final form and location of attenuation to be confirmed at reserved matter application stage for each catchment.

7. Exact detail of onsite drainage to be confirmed through detailed design. This can be achieved through provision of swales, ditches, permeable paving or other forms of suds and in accordance with the suds vision for new eastern villages (nev) supplementary planning document (spd) – February 2017."

As raised during the pre-app process, we do have concerns regarding the central open space which is currently within flood Zones 2 & 3. It is proposed to be diverted post development, but the geology in this area is shown to be a wide corridor of alluvium deposits on the BGS maps so even though the flood plain is being removed, it is likely to be still connected to the existing river network underground and groundwater is likely to be an issue in this area. We have asked previously that extensive groundwater monitoring is carried out across the site at the earliest opportunity to understand the seasonal groundwater levels and ensure that will not have an effect on any proposed drainage features and the wider development.

We do not expect the attenuation locations to be set as part of the strategic condition as the strategic condition is about ensuring the strategic watercourse and swale network is adequate to provide outfalls for the development parcels. Whilst further land could be safeguarded for features at this stage, we expect the required Source Control and attenuation features to be provided and agreed when the parcels come forward which would need to be in line with the parameters agreed in the FRA addendum and any further requirements set in the Strategic condition.

The Strategic condition states;

“Prior to the approval of the first reserved matters, a Strategic Surface Water Management Scheme for the site, in accordance with the approved Addendum to March 2019 Flood Risk Assessment (27970/4003/TN001) dated 22/08/19, shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall include:

- *Details to demonstrate how the proposed flows from the site will be restricted to 4.67l/s/ha for all events up to and including the 1% AEP + climate change event;*
- *Details of how the drainage scheme has been designed to incorporate SuDS techniques to manage water quantity and maintain water quality as set out in the FRA addendum, and in accordance with adopted policy and best practice guidance including the New Eastern Villages SuDS Vision SPD and the SuDS Manual C753;*
- *A strategic surface water drainage plan showing the proposed location of the proposed SuDS features;*
- *Details of the volumes (including indicative dimensions and indicative cross sections) and proposed construction details of the proposed SuDS measures;*
- *Details of how the scheme shall be maintained and managed after completion;*
- *Detailed drainage calculations for all rainfall events up to and including the 1 in 100 year plus climate change event to demonstrate that the strategic SuDS features can cater for the critical storm event for its lifetime;*
- *The submission of evidence relating to accepted outfalls from the site, particularly from any third party network owners; and*
- *Sequencing for implementation in accordance with the approved Phasing Plan (Condition 9). “*

The current information submitted is insufficient and does not address or cover all the points listed above.

Condition 9 (Phasing)

We note that the School is in Phase 1 however, the site drains to Phase 2. The required strategic drainage for this parcel must be delivered as part of Phase 1.

The required drainage for each phase should be clearly identified on the plans and included in that phase.

We do not recommend that this condition is discharged until the strategic drainage has been agreed.

Richard Bennett
Drainage Engineer
Lead Local Flood Authority
Email: llfa@swindon.gov.uk