

Consultation Response

To: Planning Services
From: Lead Local Flood Authority
Date: 6th December 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

We note that the revised strategy has moved forward in addressing the outstanding issues. The catchments have been split up further to match the parameters of the agreed outline strategy with a further number of attenuation features shown across the site utilising existing ditches as outfalls.

Whilst this has maintained the existing regime in many catchments across the site, some outfalls are still being proposed through long sections of pipe which is not acceptable. The level of strategic conveyance features, in the form of the existing ditches and further proposed swales that was shown on the outline strategy, still has not been provided. There are a number of areas where ditches exist but have not been fully surveyed due to vegetation. This strategic network whether it is proposed or existing, needs to be provided throughout the site to ensure all parcels can have an adequate outfall.

The revised strategy is still proposing the central ditch to be enhanced and utilised as storage but this is within the modelled fluvial flood extent so is not acceptable. This ditch needs to be maintained at its current level to allow flood flows to pass through and provide adequate outfalls from the parcels as well as ensuring groundwater levels are not increased post development.

As stated in our previous comments, 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.

We expect the required Source Control and attenuation features to be provided and agreed when the parcels come forward, through the phased condition, which would need to be in line with the parameters agreed in the FRA addendum and any further requirements set in the Strategic condition.

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