

# Consultation Response

**To:** Planning Services  
**From:** Lead Local Flood Authority  
**Date:** 27<sup>th</sup> July 2023

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**Application number:** S/23/0438

**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. Variation of conditions 9, 10, 41, 42, 43, 46 and 47 from previous permission S/OUT/19/0582.

**Location:** Lotmead Site New Eastern Villages

## Recommendation – Objection

### Detailed comments

The latest details are not inline with the approved FRA Addendum (Ref: 27970/4003/TN001, Dated: 22/08/2019) produced by PBA/Stantec or the adopted SuDS Vision SPD February 2017. The proposals change the whole principles of the development and it is not just a variation on the wording of these conditions that will ensure compliance.

Therefore, it has not been demonstrated that the development will not increase the risk of flooding elsewhere and therefore is contrary to Paragraph 167 of the National Planning Policy Framework (NPPF) and Policy EN6 of the adopted Swindon Local Plan 2026.

The latest proposals do not look to safeguard land in the right place for surface water management to ensure that any features will not be affected by the existing fluvial flood plain levels and increase the risk of flooding elsewhere.

The site currently drains via a network of shallow drainage ditches to the main rivers flowing through the site. The new development areas must look to discharge flows throughout the existing drainage networks, to ensure the existing drainage regime is maintained and biodiversity is retained, inline with the local and national guidance. However, whilst the

ditches are being retained, the new proposals are proposing to divert these flows via new deeper drainage systems to larger attenuation features on edge of the development, immediately adjacent to the floodplain, to maximise the development areas. This does not ensure that the required surface water attenuation is managed above the fluvial and groundwater levels as required by the adopted SuDS Vision SPD.

Large parts of the proposed site are within Flood Zones 2 & 3 with development islands proposed between flood plain of the the River Cole, the Dorcan Brook and the Liden Brook. There are flood risk issues upstream of the site within Wanborough, Liden and Covingham, and also downstream in South Marston and Oxfordshire. In addition to the development areas being between these flood plains, they are fairly flat and low lying and therefore, the groundwater table is likely to be high during periods of prolonged rainfall.

Due these flood risk issues within and adjacent to the site, the SuDS Vision SPD was adopted to ensure development across the NEV provides a robust drainage scheme inline with national guidance. Inline with this guidance, space must be allocated for shallow above ground conveyance features throughout the development, utilising the natural drainage routes and existing drainage features wherever possible and priority must be given to source and site control measures to ensure that attenuation can be provided that will not be compromised by fluvial flood levels and groundwater levels.

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.

Whilst progress was being made during the RM and Condition Discharge applications to address the LLFA concerns, the new proposals have now reverted back to large ponds adjacent and below the flood plain extents and levels which is 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 key strategic network of existing ditches and proposed swales that was shown on the outline Surface Water Management Strategy within the approved FRA Addendum, 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.”

The following conditions must still stand to ensure the development comes forward inline with the approved Addendum to March 2019 Flood Risk Assessment (27970/4003/TN001) dated 22/08/19 and therefore, in accordance with the Adopted SuDS Vision SPD, Policy EN6 of the Local Plan and Paragraph 167 of the NPPF.

**46. Strategic Surface Water Management Scheme**

*“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). “*

*Reason: To ensure development does not increase the risk of flooding elsewhere; in accordance with Paragraph 155 of the National Planning Policy Framework (NPPF) and Policy EN6 and NC3 of the adopted Swindon Local Plan 2026.*

**47. Surface Water Management Scheme (Phases)**

*Prior to the approval of any related reserved matters, a detailed Surface Water Management Scheme for each phase or sub-phase of development, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be in accordance with the details approved as part of the strategic scheme (Condition 46), and include all supporting information as listed in that condition. The scheme shall be implemented in accordance with the approved details and timetable.*

*Reason: To ensure development does not increase the risk of flooding elsewhere; in accordance with Paragraph 155 of the National Planning Policy Framework and Policies EN6 and NC3 of the adopted Swindon Local Plan 2026.*

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