

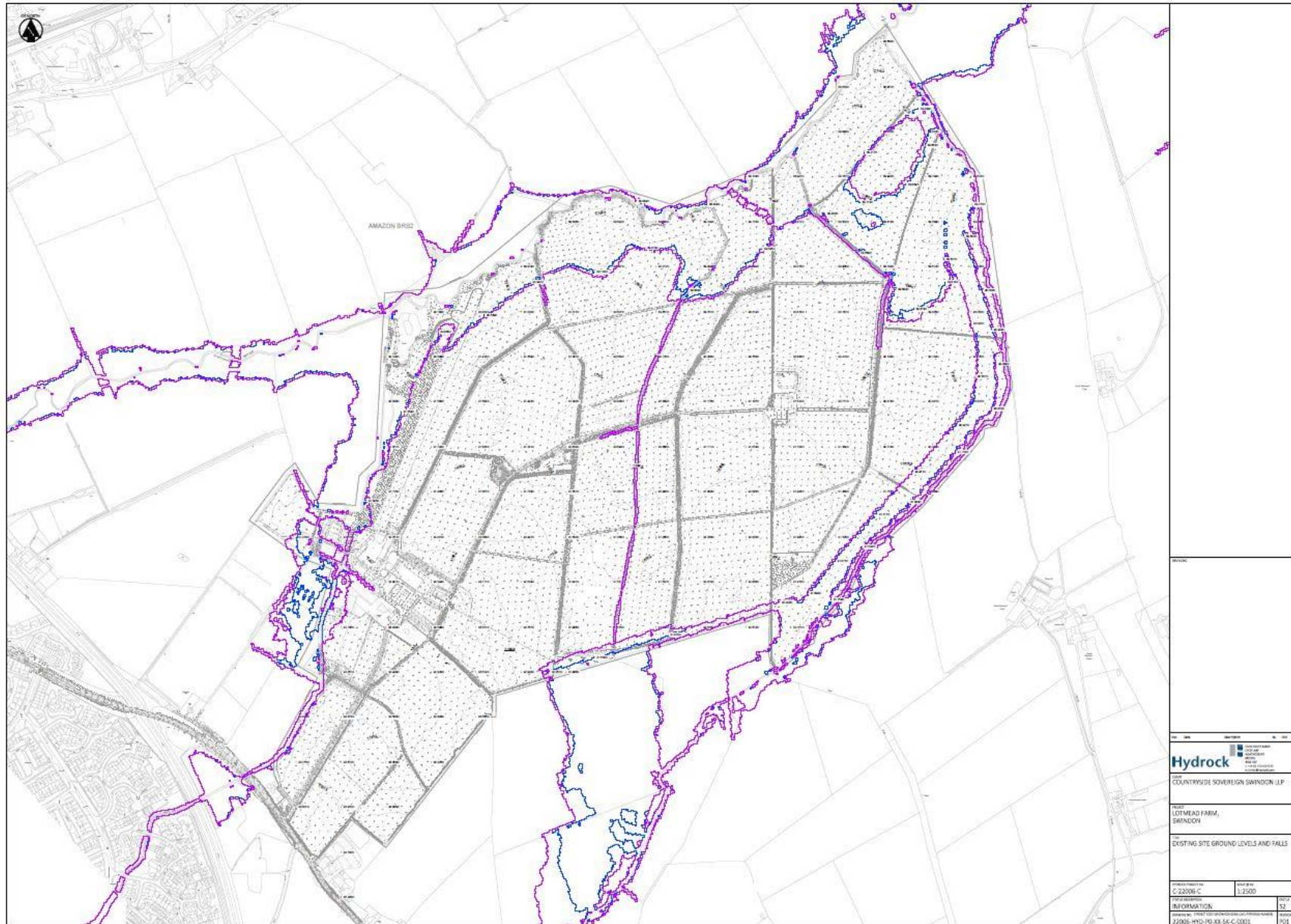
Lotmead, Wanborough

Response to LLFA Reasons for Refusal
(Condition 46: Outline Planning Permission
S/OUT/19/0582)

Agenda

- | | | |
|---|---|-----------------------|
| 1. Introductions | - | All |
| 2. Purpose of Meeting | - | Savills |
| 3. High Level Overview of FRA Addendum Requirements | - | Hydrock |
| 4. Review and Response to Outstanding LLFA Comments | - | Hydrock / Countryside |
| 5. Agreement on any Changes Required | - | SBC / All |
| 6. High Level Discussion on Design Implications | - | Hydrock / Countryside |
| 7. Timescales | - | All |
| 8. AOB | - | All |

Existing Site Levels & Floodplain Extents

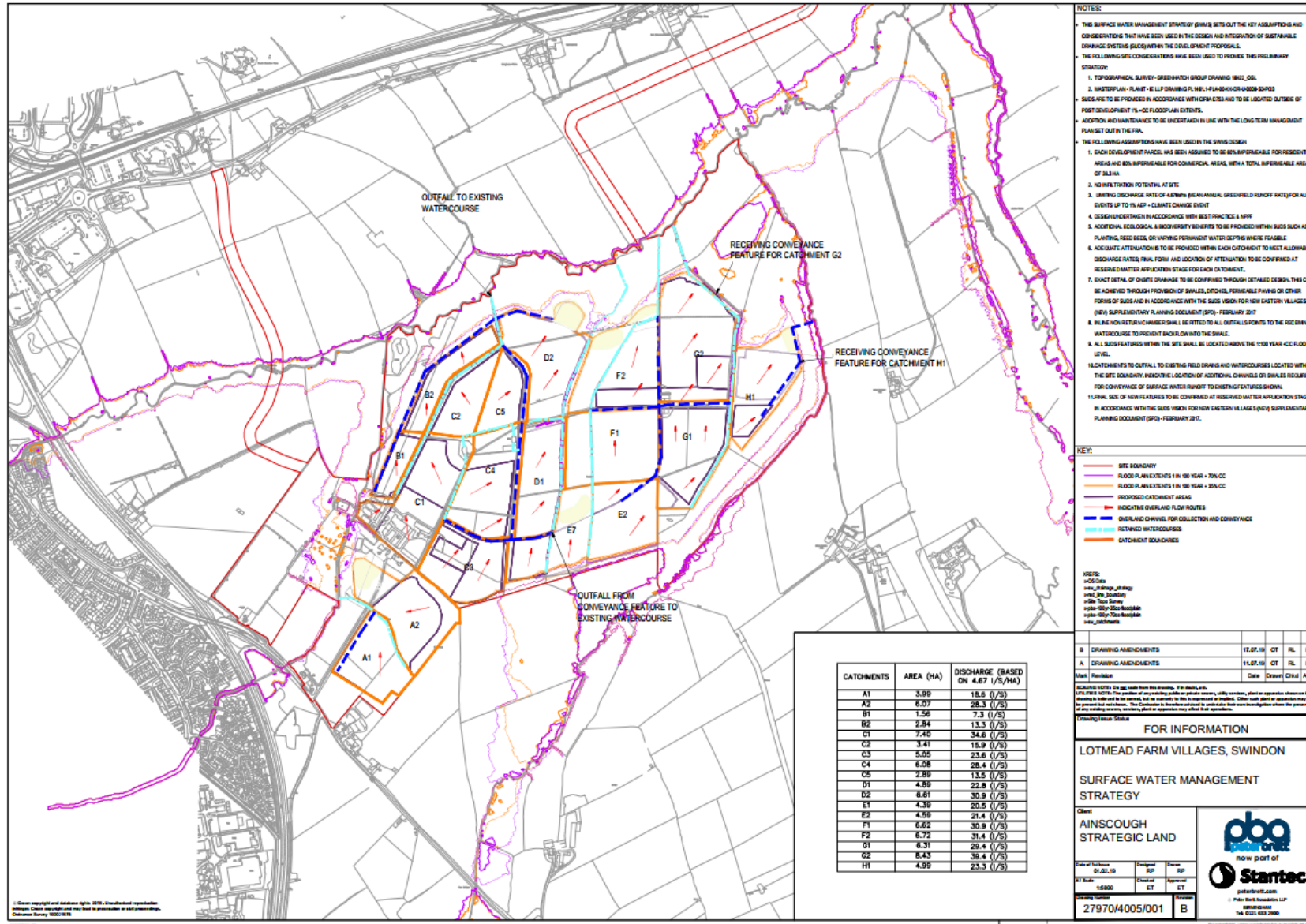


Parameters within the FRA Addendum

Surface Water and SuDS

- Outside of 1in100 +CC floodplain.
- SuDS prioritised in the following hierarchy:
 - Primary – Plot scale ‘source control’ such as raingardens, permeable paving etc;
 - Secondary - Under drained swales providing conveyance and attenuation storage;
 - Tertiary - Attenuation basins or ponds providing attenuation storage.
- Watercourses, retained and utilised.
- Catchments, restricted to mean annual greenfield rate (4.67 l/s/ha).
- Attenuation above 1in100 +CC flood level.
- In accordance with Ciria C753, NPPF & NEV SuDs vision SPD.
- Further detail to be submitted.

FRA Addendum drawing showing catchments



Response to LLFA Reasons for Refusal

Reasons for Refusal (6th December 2022)

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.

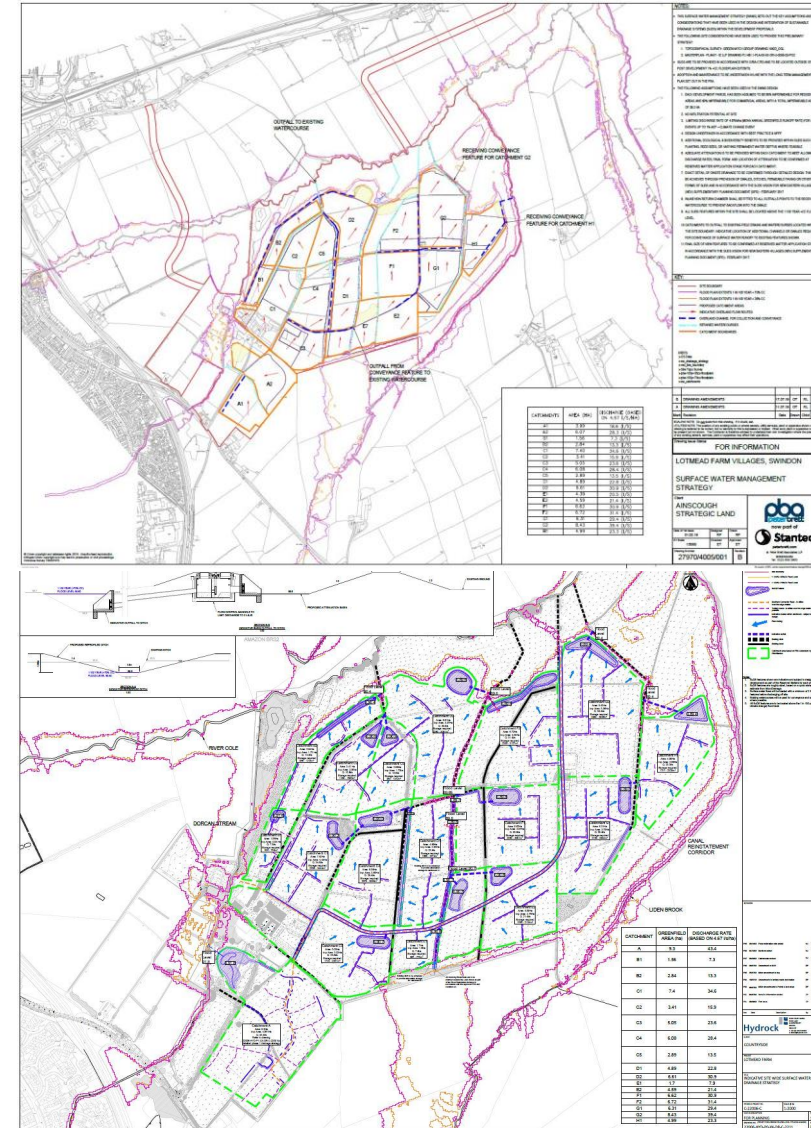
Response to LLFA Reasons for Refusal

LLFA Detailed Comments

1. 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.

Response

The catchments have been updated on the Hydrock Drainage Strategy drawing in accordance with the PBA / Stantec Surface Water Management Strategy



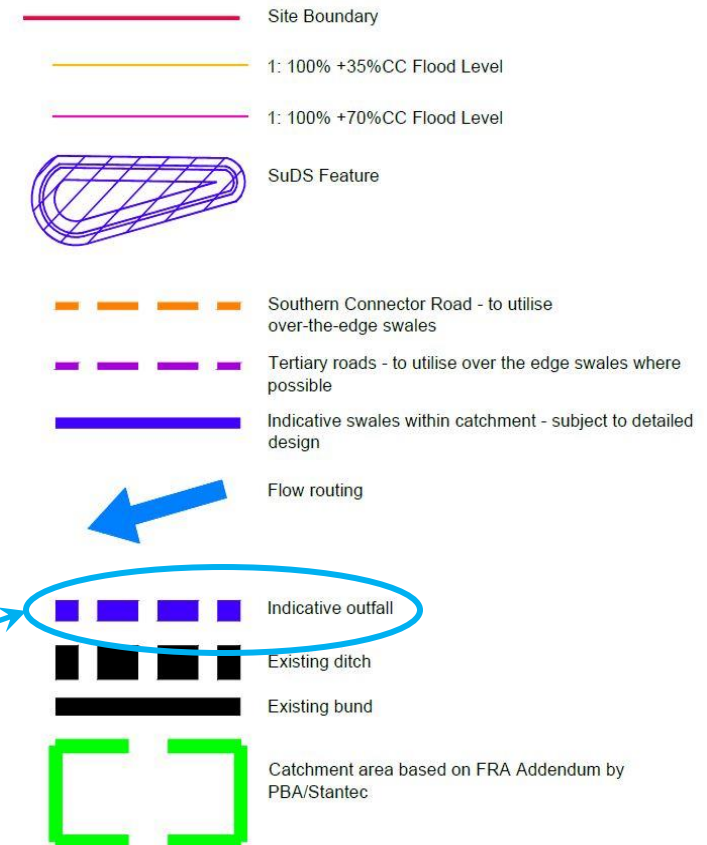
Response to LLFA Reasons for Refusal

2. 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.

Response

The Hydrock Drainage Strategy drawing does not detail these as pipe's, ditches or swales, they are simply denoted on the drawing key as 'Indicative Outfalls' at this stage. How they are constructed will follow in the detail of condition 47.

KEY



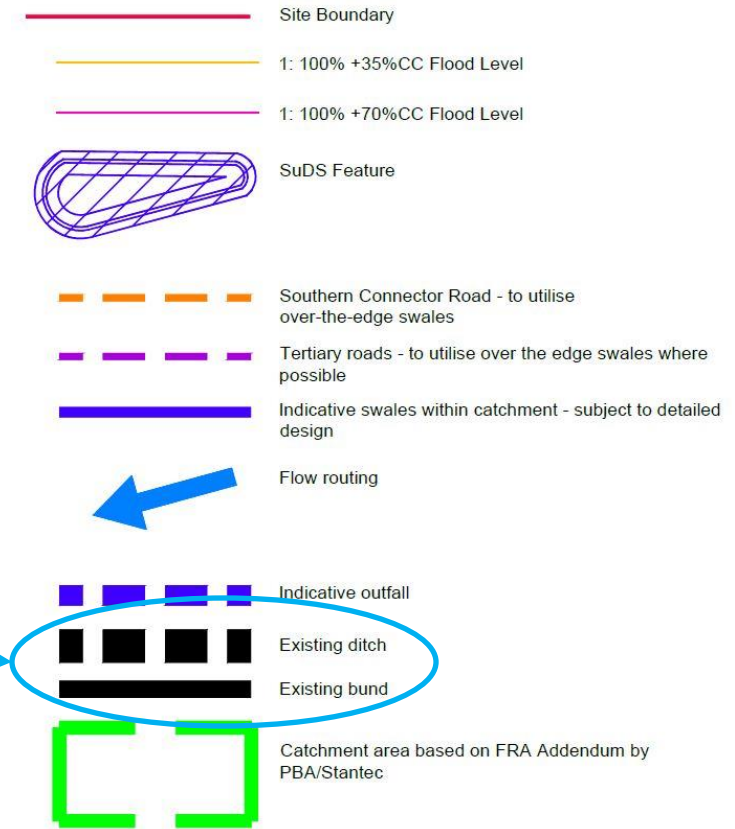
Response to LLFA Reasons for Refusal

3. 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.

Response

a) All of the existing ditches are shown on the drainage strategy drawing (22006-HYD-PO-XX-DR-C-2211 Rev09) with black dashed lines.

KEY



Response to LLFA Reasons for Refusal

3. (cont.) 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.

Response (continued)

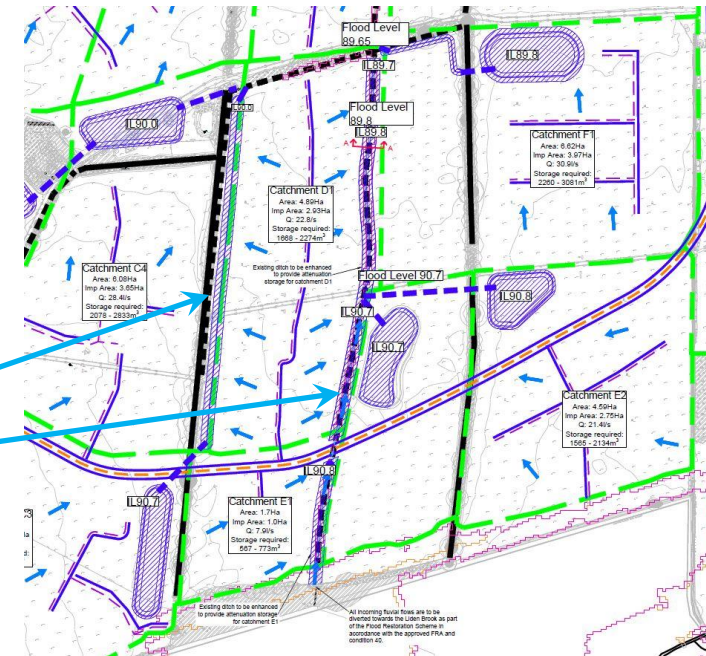
b) The approved FRA addendum plan (27970/4005/001 Rev B) show no ponds or swales, only 'overland channel for collection and conveyance' as identified in the drawing key.

Proposed swales are shown on the Hydrock drainage strategy drawing.

FRA Addendum Drawing Key

KEY:

- SITE BOUNDARY
- FLOOD PLAIN EXTENTS 1 IN 100 YEAR + 70% CC
- FLOOD PLAIN EXTENTS 1 IN 100 YEAR + 35% CC
- PROPOSED CATCHMENT AREAS
- INDICATIVE OVERLAND FLOW ROUTES
- OVERLAND CHANNEL FOR COLLECTION AND CONVEYANCE
- RETAINED WATERCOURSES
- CATCHMENT BOUNDARIES



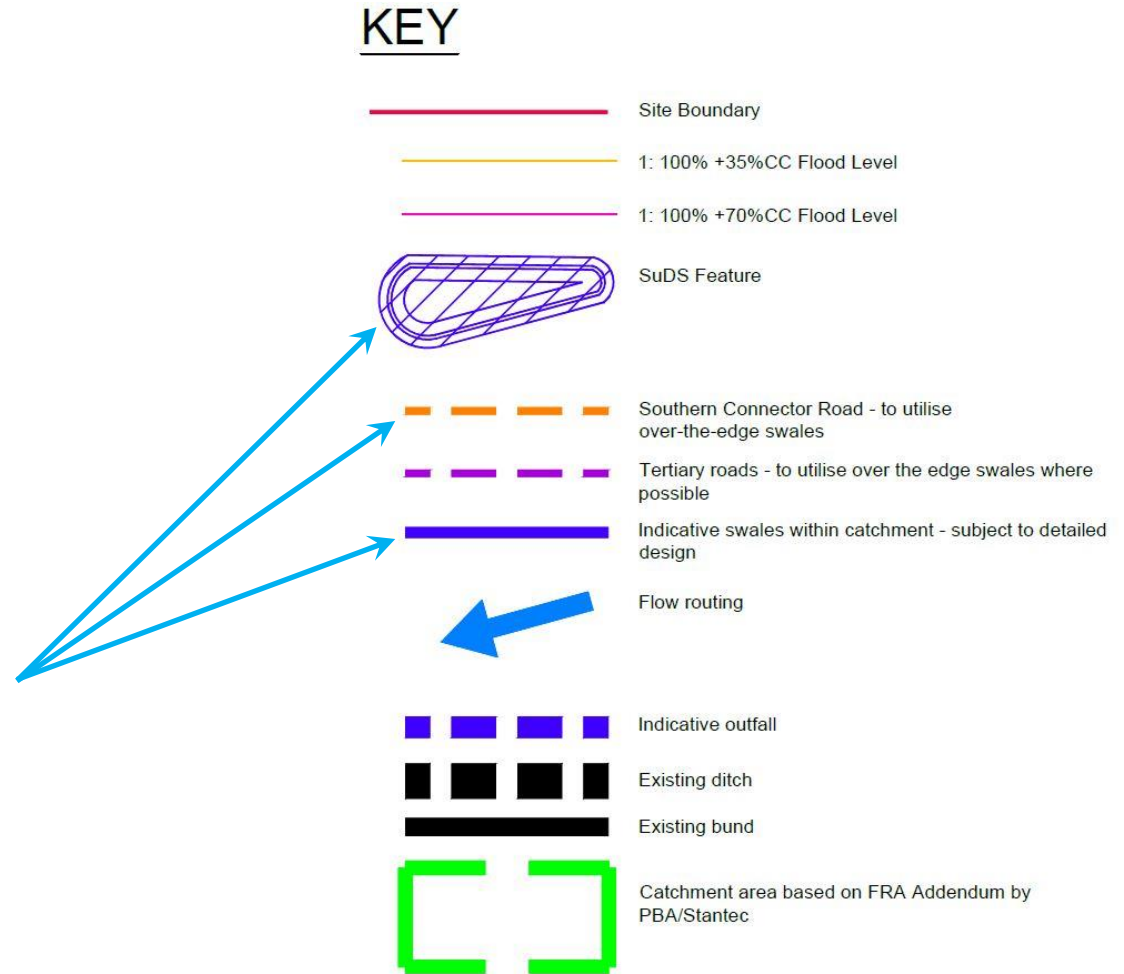
Extract of Hydrock Drainage
Strategy Drawing

Response to LLFA Reasons for Refusal

3. (cont.) 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 as not been provided.

Response (continued)

c) In addition the Hydrock drainage drawing shows many more features across the whole site as required by Condition 46



Response to LLFA Reasons for Refusal

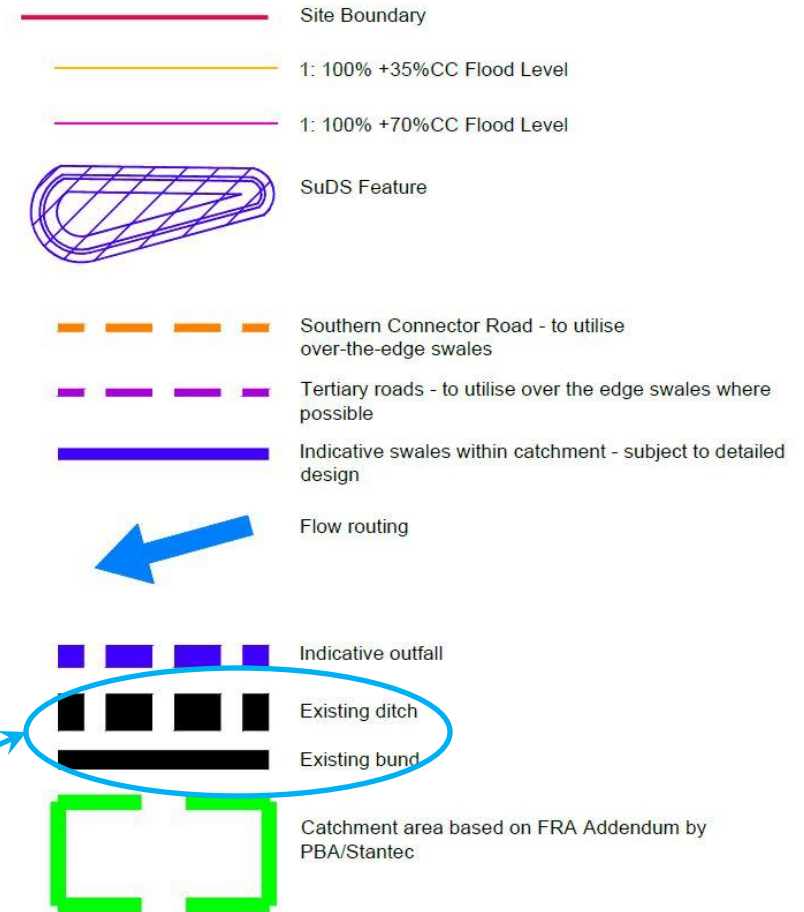
4. There are a number of areas where ditches exist but have not been fully surveyed due to vegetation. This strategic network whether it is proposed or existing, needs to be provided throughout the site to ensure all parcels can have an adequate outfall.

Response

The topographical surveyor has re-surveyed the site and captured all ditches which are denoted on the Hydrock Drainage Strategy Plan. There are also bunds beneath some of the hedgerows which are denoted on the drawing and in the key.

Further clarification is required from the LLFA where the 'missing ditches' are situated

KEY



Response to LLFA

Reasons for Refusal

5. 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.

Response

Fluvial flows are being diverted away from the central ditch as part of the Flood Plain restoration works, this is a key principle agreed with the EA and is covered in the FRA & FRA addendum. This allows the central ditch to be used & enhanced. No fluvial flows will utilise this ditch once the flood restoration works are complete. The base level of the ditch will remain unchanged.

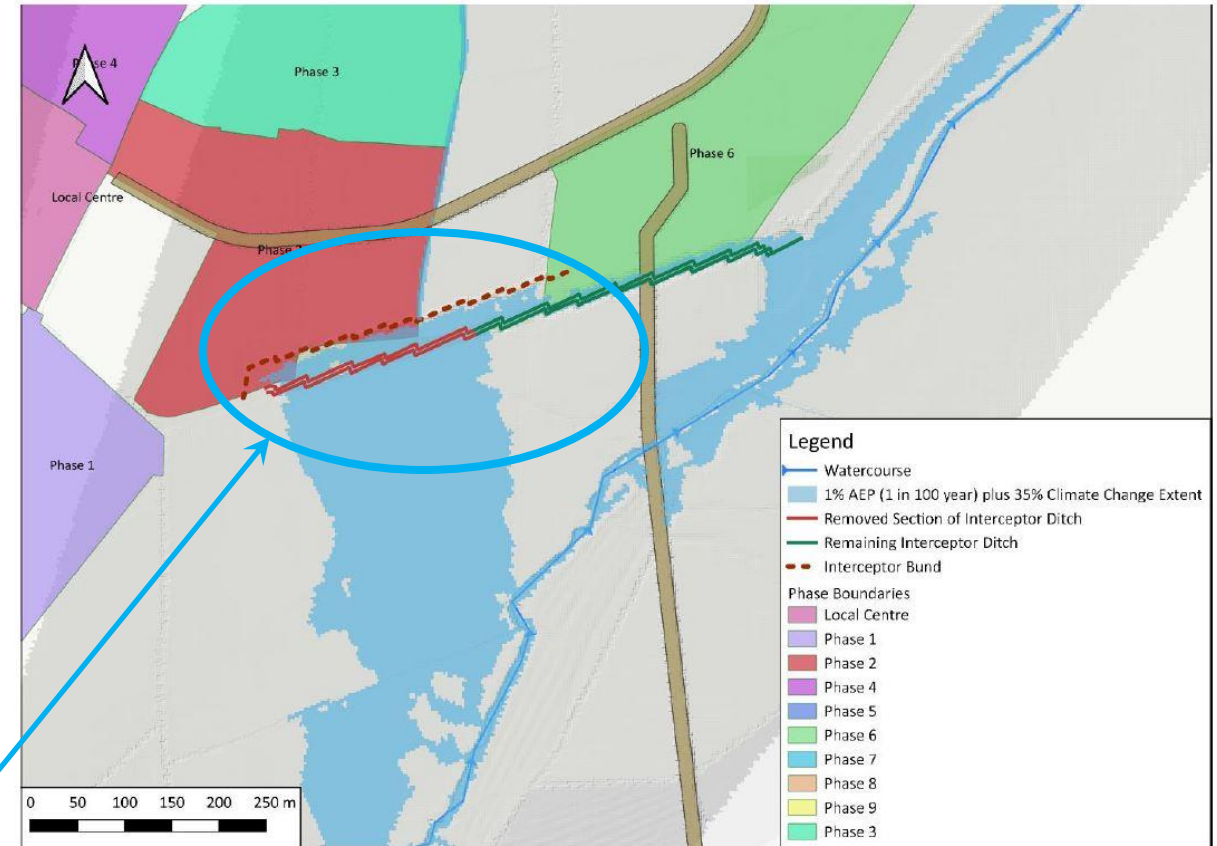


Figure2. Updated Restoration Works - removal of interceptor ditch

Response to LLFA

Reasons for Refusal

6. 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.

Response

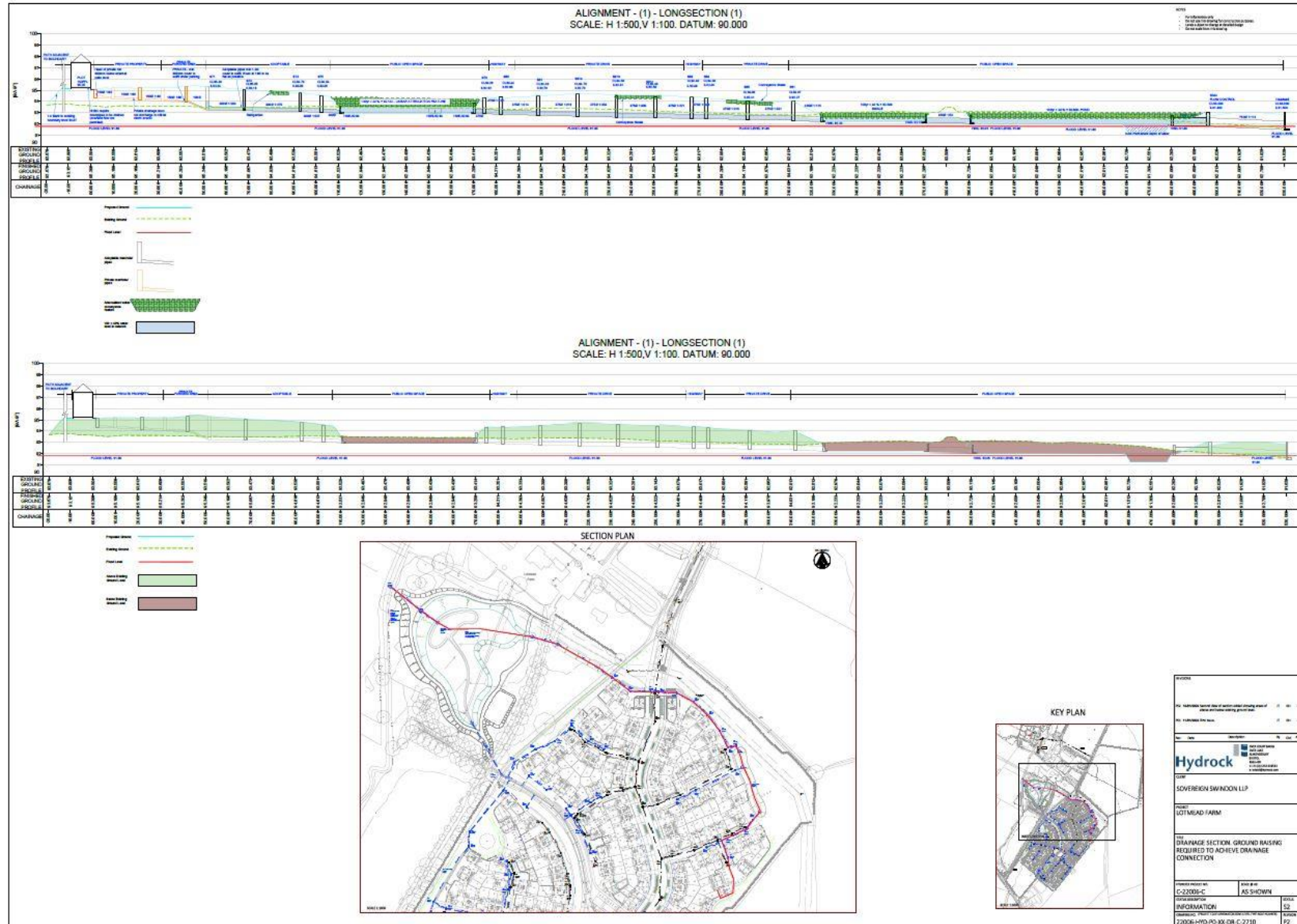
Condition 46 requires 'A strategic surface water drainage plan showing the proposed location of the proposed SuDS features'. It also requires us to demonstrate how SuDS techniques are incorporated and provide details of volumes and dimensions. These features are shown on the Hydrock Drainage Strategy Plan in order to meet the requirements of the condition and enable it to be discharged.

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:

- o 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;
 - o 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;
 - o A strategic surface water drainage plan showing the proposed location of the proposed SuDS features;
 - o Details of the volumes (including indicative dimensions and indicative cross sections) and proposed construction details of the proposed SuDS measures;
 - o Details of how the scheme shall be maintained and managed after completion;
 - o 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;
 - o The submission of evidence relating to accepted outfalls from the site, particularly from any third party network owners; and
 - o Sequencing for implementation in accordance with the approved Phasing Plan (Condition 9).
- The detailed Surface Water Management Schemes for each phase or sub phase (as required by condition 48) 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 (NPPF) and Policy EN6 and NC3 of the adopted Swindon Local Plan 2026.

Implications of Strategic Drainage Strategy



Actions from Meeting

- Questions?
- Next Step and Agree on Actions
- Programme to get the condition approved
- Pencil in follow up meeting?
- AOB



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