

**Sustainable Drainage Systems (SuDS) Vision
for New Eastern Villages
Supplementary Planning Document**

Statement of Consultation

February 2017

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1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted on the draft of the Sustainable Drainage Systems (SuDS) Vision for New Eastern Villages (NEV) Supplementary Planning Document (SPD).

2. Purpose

- 2.1 In accord with the Swindon Borough Local Plan 2026 (Local Plan) and in particular Policies EN6 and NC3, the SPD focuses upon the management of surface water by the use of SuDS and sets out:
- The concept underpinning SuDS,
 - The vision for drainage in the NEV,
 - The engagement and approval process,
 - How SuDS schemes should work in practice,
 - Design and construction guidelines, and
 - Potential maintenance and management models.

3. When did consultation take place?

- 3.1 Public consultation on the draft SPD took place between Thursday 21st July and Thursday 1st September 2016. A total of 16 responses were received; generating 96 comments.

4. Who was consulted?

- 4.1 In accord with the Town and Country Planning (Local Planning) (England) Regulations 2012, all statutory consultees and interested parties were notified of the public consultation.
- 4.2 A formal public notice was made available in the locally distributed newspaper, together with publication on the Swindon Borough Council website, and hard copies of documents were made available at all libraries and Parish / Town Councils within the Borough.

5. Summary of the Main Issues Raised

- 5.1 The following paragraphs seek to summarise some of the main comments made. However, due to the high number of responses received, it is not appropriate to detail all of them within this Statement of Consultation. A hard copy of detailed comments made and Officer responses are appended to this document.

Stakeholder Responses

5.2 Comments were received from stakeholders including:

- Barberry (Swindon) Ltd
- Environment Agency
- Hannick Homes, Hallam Land and Taylor Wimpey (DLA)
- Natural England
- Sainsbury's Supermarkets Ltd
- South Marston Parish Council
- Thames Water Ltd
- The Wiltshire Swindon & Oxfordshire Canal Partnership
- The Woodland Trust
- Wanborough Anti Flood Group
- Wanborough Parish Council
- Wilts & Berks Canal Trust (including responses from their members Nationwide)
- Several individuals also responded to the consultation.

Comments from Land Owners, Strategic Land Promoters and Developers

5.3 In summary, comments made by **Harris Lamb (on behalf of Barberry Limited)** related to the following:

- We do not think that there is any specific tie up between the policy requirements of EN11 and SuDS. Whilst we acknowledge that part of the SuDS solution may involve drainage into the canal this does not have an implication for the heritage issues identified under EN11 and the reference to this should be deleted.
- Should be amended to suggest that the acceptability of traditional gulley and pipe systems will depend upon the overall specific scheme being promoted;

- There is a concern that the island specific section is too long and refers to a number of considerations such as landscape, urban character and design;
- To have a “complete and functional” design may be impractical at outline planning application stage; and
- There is an objection to the reference that Redlands will be a “small hamlet”.

The Council's Response

- 5.4 In terms of Policy EN11, the addition of a canal to the NEV could have a significant impact on the existing and proposed drainage systems; as a result, the safeguarded alignment must be considered in the context of the wider strategic allocation.
- 5.5 The SPD indicates that SBC will not accept a drainage strategy that seeks to use traditional gulley and pipe systems discharging to large attenuation features close to the final discharge point, as this will not meet policy requirements. Traditional pipe and gulley solutions may be more appropriate in certain circumstances, however they will need to be in accordance with other SuDS systems to ensure they meet policy requirements.
- 5.6 The section on character villages seeks to provide guidance on the proposed characteristics of each village, rather than a prescriptive section on the detailed design concepts for each development island. SuDS features are integral to the development and must be considered in the context of the other design and site constraint considerations. As a result, the references to other environmental matters is considered appropriate. Notwithstanding this, amendments have been made to ensure concise and relevant details are provided and that the terminology does not restrict forthcoming proposals.
- 5.7 In summary, the main points submitted by **David Lock Associates (on behalf of Hannick Homes, Hallam Land and Taylor Wimpey)** related to the following:
- The SPD claims to *“align with current policy and guidance including specific requirements which are set out in the Adopted Local Plan”*. To support this position section 1.3 draws attention to national guidance before considering the Local Plan. It is very clear that neither policy position justifies the approach set out in the SPD and that there is substantial lack of alignment between the two;

- The SPD is highly selective in its references to national policy and is not consistent with national policy in places;
- There is virtually no recognition of the need to avoid financial burdens in the SPD, either informing the text of the SPD or in explaining the process by which development proposals would need to be considered;
- Concerns have been raised in reference to paragraph 153 of the NPPF, which states that SPDs “should not be used to add unnecessarily to the financial burdens on development”.
- The technical standards make no reference to the means by which SuDS should achieve the technical standards set out therein. No reference is made to source control as close as possible to source, to green roofs, to types of highway drainage systems.

The Council’s response

- 5.8 It must be recognised that the SuDS Vision is not providing new policy, it is providing guidance to developers to ensure surface water drainage strategies / schemes align with current guidance and legislation and provide sustainable drainage to adequately manage surface water across the NEV. The Local Plan expects drainage strategies to incorporate SuDS, however there is no guidance detailed in the Local Plan, NPPF, PPG or other supporting Technical Standards on SuDS or which measures are required to deliver an effective SuDS scheme.
- 5.9 In terms of the references to national policy, the CIRIA SuDS Manual provides the recognised national guidance for the delivery of SuDS and therefore the SuDS Vision for the NEV SPD must accord with the guidance set out in this document.
- 5.10 The SPD suggests measures that the LLFA consider can be implemented, in certain circumstances where it is feasible, without being an unreasonable burden on developers and must be considered. The SPD does not set new policy and national policy is considered sufficient to ensure that unreasonable costs and burdens will not be placed on development.
- 5.11 Whilst the NEV development area must be acknowledged as an area at risk of flooding, the NPPF can only consider development in areas at risk of flooding if it gives priority to the use of sustainable drainage systems. Whether or not a SuDS system would be inappropriate in a particular circumstance is to be a matter of judgment for the local planning authority, but it must have regard to what flood risk bodies consider to be reasonably practical, principally the lead

local flood authority, including on what sort of sustainable drainage system they would consider to be preferable.

- 5.12 The measures identified are those that the Lead Local Flood Authority (LLFA) feels are required and must be considered and implemented wherever possible. This is due to the location of the NEV and the existing on and off site flood risks.

Parish Councils

- 5.13 In summary, comments from **Wanborough Parish Council**:

- Play areas and sports pitches should not be allocated within flood zones and used for the purpose of SuDS;
- No SuDS features should become the responsibility of Parish Councils and there needs to be sufficient maintenance provision within the proposed development sites to ensure that all SuDS are maintained properly to prevent future flooding;
- Wanborough Road regularly floods, who will be responsible for the maintenance of the ditches along Wanborough Road once the NEV is developed;

Council's response

- 5.14 In some instances, the location of sports pitches may be appropriate in an area at risk of flooding; however the developer would need to ensure that they are available for use a majority of the time.

- 5.15 The SuDS Vision outlines a number of potential maintenance options available to developers and land owners. The responsibility lies with the land owner to ensure one of these methods is adopted, and therefore the Council have limited control on determining the specific future maintenance of the SuDS features. In some instances, it may be suitable for a Parish Council to take on responsibility for the maintenance of SuDS and open space, however this would be determined through the appropriate consultation options.

- 5.16 The SUDS Vision does not seek to resolve specific local flood issues, but provide guidance on the most appropriate methods and techniques to use across the NEV. It is the responsibility of the land owners on adjacent land to Wanborough Road to ensure they are maintained properly.

- 5.17 In summary, comments from **South Marston Parish Council**:

- However, SuDS design needs to take account of road and right of way (ROW) networks within any planning application in a way that maximises opportunities for roadside channels and culverts to divert or disperse

surface water into swales or basins. The complete highways network may not be available at outline application stage. It may therefore be appropriate for the draft SPD to state that, in such cases, the detailed SuDS design must be a reserved matter on grant of outline permission or submitted at masterplanning stage.

- Consider that some of the existing flow routes will no longer be appropriate since they cut through the individual development parcels and will simply increase the overall risk to new and existing properties en route. It would make more sense to develop SuDS measures that fully utilise the retained green infrastructure within the development and roadside attenuation alongside new road or cycleway construction.
- SuDS proposals should be fully consulted upon and agreed prior to formal submission of any detailed planning application.
- Detailed comments were made to specific references to South Marston in the document.
- The SPD does not identify the extent of surface water flow from west to east across the proposed development area north of the A420. The text makes reference to the Environment Agency surface water flood map, but fails to follow through with the implications of this.
- Consider that Parish Councils are appropriate consultees for SuDS proposals.

Council's response

- 5.18 The Council consider the process outlined within the SPD to be sufficient to adequately address the concerns of insufficient details being available at the outline stage. As part of the planning process, relevant conditions will be recommended where appropriate to ensure sufficient detail is provided at the reserved matters stage.
- 5.19 In terms of the site specific sections, plans have been updated to show the EA surface water flood maps and arrows have been removed to avoid misinterpretation and the supplementary text has been amended for clarity. The Masterplan at this stage is indicative and the layout of the proposed development areas will need to ensure that all surface water flow routes are maintained through it. The Council have liaised with the consultant working on behalf of the applicant for the South Marston Expansion and the Rowborough developments and have asked them to demonstrate that all surface water flow routes are maintained safely through these development areas to ensure the development will be in accordance with Section 3 of the SuDS Vision.

- 5.20 The principle SuDS strategy for a particular application site would be expected to be part of any submission. In terms of a detailed design, the Council do not consider it appropriate that that this be established at the outline stage. Appropriate planning conditions will be attached to any consent to ensure the detailed strategy is submitted and agreed at the required time.
- 5.21 The island specific sections have been moved to the main document from the appendices. For clarity, the sections have been shortened and amended to provide succinct guidance on the local drainage situation and the proposed village characters.
- 5.22 In summary, comments from **Wilts & Berks Canal Trust (WBCT)**:
- The Trust is convinced of the vital importance of the built canal as part of the infrastructure within the NEV development acting as an integral part of the drainage management and flood prevention strategy for the NEV.
 - The aggregate effect of the overall increased drainage from all the planned developments has not been fully investigated. In addition SuDS require considerable maintenance to ensure that they perform properly and as yet the responsibility and associated costs for this maintenance is not defined.
 - With respect to utilising the Wilts & Berks Canal for flood mitigation, SBC still maintain that drainage is an issue for each and every development within the NEV rather than an overall solution for the NEV, which would be provided by the canal.
 - The Trust do not believe, based upon professional and expert view, that the current SuDS strategy, will prove fit for purpose and we further believe that the NEV will, in all likelihood, be inundated with flood water if the current piecemeal strategy is not amended to include the built canal.
 - The Trust do not understand the reluctance to engage in the assessment of the canal as part of an overall NEV strategy, when the economic rationale for the canal as an integral part of the NEV flood defence could be offset by a smaller SuDS provision and the benefits that would ensue for the participating developers
 - The practical design, construction and maintenance of SuDS is fraught with difficulties. As such, SuDS cannot be relied upon to provide adequate flood protection which caters for differing rainfall and drainage channel conditions.

Council's response

- 5.23 The Council recognises and welcomes the significant benefits that future delivery of the Wilts & Berks Canal within the NEV would provide for existing and new communities.
- 5.24 With regards to the submission of technical information, a response to 'Document 3: Technical Note' will be provided separately to this statement.
- 5.25 In the absence of an outline planning application for the NEV strategic allocation and with the challenges of different land ownership, developers and promoters, the SPD seeks to promote a coordinated approach to the delivery of SuDS across the development.
- 5.26 The Council acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits. It is recognised in the SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.
- 5.27 Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed as part of the application however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.
- 5.28 There are a vast number of measures that can be combined to provide an adequate SuDS scheme with a number that are practical to design, construct and maintain to manage surface water.
- 5.29 In summary, comments from **Wanborough Anti-flood Group**;
- The footpath next to the canal which goes under the new proposed canal tunnel approximately 300m east of Acorn Bridge Road, is outside of the NEV. There is no reference to say if the footpath will be constructed before or after the canal is built. Concern is therefore expressed that this will not be financed by the NEV. We also have similar concerns that there will be no liaison between the tunnel constructors and designers and Network Rail to ensure that this tunnel does not flood.
 - It is very well known by SBC that flooding of the NEV land starts from the Great Moorleaze Farm area as this is the lowest level. That is why Thames Water chose to build their pumping station there.
 - Excess surface flood water from the A419, Pack Hill and the surrounding hills enters the Liden Brook at this location, therefore, it is beyond belief that you have allowed the canal to be shown at a level of 105m OD when the lowest catchment level is 103m OD.

Council's response

- 5.30 The Council is working with its partners including Network Rail to ensure the delivery of a comprehensive footpath and cycleway network across the NEV.
- 5.31 The Council acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.
- 5.32 Therefore the Council is happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.

6. Post consultation changes made to the SuDS Vision for NEV SPD

- 6.1 As a result of the consultation exercise, a number of amendments were made to the draft FTP including:
- Amendments have been made to the structure of the document, increasing the number of Sections from 4 to 5.
 - Additional policy references have been included within Section 1, whilst additional clarity has been provided to the existing policy context.
 - The table of relevant policy and legislation has been condensed. Full details of relevant policy and legislation is listed within Appendix A.
 - Annex 1, which consisted of village specific data has been removed, with a majority of the information and maps being relocated to Section 2 of the main document.
 - The village plans have been updated and additional flood risk information has been included for the specific islands, where appropriate.
 - Amendments have been made to the Planning Approval Process flowcharts within Section 3.

Sustainable Drainage Systems (SuDS) Vision for New Eastern Vilages (NEV) Supplementary Planning Comments (SPD) – Summary of Consultation Comments

Consultee Reference Numbers

1. David Lock Associates (on behalf of Hannick Homes, Hallam Land and Taylor Wimpey)
2. Wilts & Berks Canal Trust
3. Desmond Motram (Member of Wilts & Berks Canal Trust)
4. Environment Agency
5. Harris Lamb (on behalf of Barberry Limited)
6. Luke Walker
7. Patrick Herring
8. Natural England
9. Thames Water
10. South Marston Parish Council
11. Stuart Fisher
12. Wanborough Anti-Flood Group
13. Wanborough Parish Council
14. Wiltshire, Swindon & Oxfordshire Canal Partnership
15. The Woodland Trust
16. WYG (on behalf of Sainsbury's Supermarkets Ltd)

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
1	1	1.1	1	2.1 In the first paragraph of 1.1 the SPD claims to “align with current policy and guidance including specific requirements which are set out in the Adopted Local Plan”. To support this position section 1.3 draws attention to national guidance before considering the Local Plan. It is very clear to HHT that neither policy position justifies the approach set out in the SPD and that there is substantial lack of alignment between the two.	<p>It must be recognised that the SuDS Vision is not setting new policy, it is providing guidance to developers to ensure surface water drainage strategies / schemes align with current guidance and legislation and provide sustainable drainage to adequately manage surface water across the NEV area.</p> <p>The Local Plan expects drainage strategies to incorporate SuDS but neither the Local Plan, nor the NPPF, PPG and supporting Technical Standards give guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p> <p>The CIRIA SuDS Manual is the main recognised national guidance document for SuDS and therefore the SuDS Vision must align with this document.</p>
1	2	1.3	2	<p>2.2 The references to national planning policy in section 1.3 of the SPD are limited, partial and accordingly very misleading.</p> <p>2.3 The sole reference to the NPPF is that in relation to para 103 with part of the</p>	<p>The NEV development area must be acknowledged as an area at risk of flooding. There are a number of main rivers crossing the NEV development area and large areas are shown to be with Flood Zones 2 & 3. Although the main development areas</p>

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				<p>second bullet point of para 103 only referred to: “it gives priority to the use of sustainable drainage systems” and therefore misquoted. In actuality development being referred to in the NPPF is “development appropriate in areas of risk of flooding” and not all development (see also HCWS161). Accordingly and consistent with this the full reference in the second bullet of the NPPF relates specifically to those circumstances and is as follows:</p> <p>“103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:</p> <ul style="list-style-type: none"> • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by 	<p>(islands) may be outside Flood Zones 2 & 3, there are vast areas that are shown to be at risk of surface water flooding. Also these development islands are between or adjacent to the river flood zones and will have linkages between which will be crossing them.</p> <p>There are also known existing flooding issues to communities neighbouring the NEV development area.</p> <p>Therefore a site-specific flood risk assessment for a proposed development in the NEV area must demonstrate that the development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and must give priority to the use of sustainable drainage systems.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				<p>emergency planning; and it gives priority to the use of sustainable drainage systems”</p> <p>2.4 The preface to the quote from the NPPF in para 1.3 of the SPD that SuDS are a requirement of the NPPF and of development are not correct in this light – SuDS is not a requirement of the NPPF. They are to be prioritised in certain circumstances – where development is in areas subject to flood risk. The substantial majority of the NEV does not propose development in areas subject to flood risk</p>	
1	3	All	8-19	<p>2.5 NPPF policy that is of particular relevance to the SPD yet is not referred to any point relates to the need for policies and in particular SPDs to not place substantial costs or burdens on development.</p> <p>2.6 In this respect, paragraph 153 of the NPPF is clear that SPDs “should not be used to add unnecessarily to the financial burdens on development”. Similarly, paragraph 173 of the NPPF states that: “Pursuing sustainable development requires</p>	<p>The SuDS Vision “identifies the measures that must be investigated and implemented where feasible.” It does not require that these measures must be implemented.</p> <p>SuDS Vision is not setting new policy and national policy will still ensure that unreasonable costs and burdens will not be placed on development.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				<p>careful attention to viability and costs in planmaking and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.</p> <p>2.7 There is virtually no recognition of the need to avoid financial burdens in the Draft SuDS SPD either informing the text of the SPD or in explaining the process by which development proposals would need to be considered.</p> <p>2.9 The draft SPD presentation of the policy is therefore incomplete and misleading.</p>	
1	4	All	8-19	<p>2.10 In setting out the basic elements of the Governments policy towards SuDS, the HCWS161 indicated that prior to the policy taking effect in April 2015, the Government would publish “revised planning guidance in time for the policy changes to take effect” (para 6).</p> <p>2.11 Those changes were made in March 2015 and were incorporated into Planning</p>	<p>The planning practice guidance “Flood Risk and Coastal Change” section gives guidance on when sustainable drainage systems should be considered or prioritised; it does not provide guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p> <p>The NEV development area must be acknowledged as an area at risk of flooding.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				<p>Practice Guidance: “Flood Risk and Coastal Change”.</p> <p>2.12 As elsewhere in the SPD the references to the national guidance are highly selective and incomplete and hence are misleading. Only para 79 of the PPG is referred to and only in part. The first sentence of para 79 of the PPG are omitted namely the recognition that there will be circumstances where there may be no need for a SuDS system “Whether a sustainable drainage system should be considered will depend on the proposed development and its location, for example whether there are concerns about flooding. Sustainable drainage systems may not be practicable for some forms of development (for example, mineral extraction)”.</p>	<p>There are a number of main rivers crossing the NEV development area and large areas are shown to be with Flood Zones 2 & 3. Although the main development areas (islands) may be outside Flood Zones 2 & 3, there are vast areas that are shown to be at risk of surface water flooding. Also these development islands are between or adjacent to the river flood zones and will have linkages between which will be crossing them.</p> <p>There are also known existing flooding issues to communities neighbouring the NEV development area.</p> <p>Therefore a site-specific flood risk assessment for a proposed development in the NEV area must demonstrate that the development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and must give priority to the use of sustainable drainage systems.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
1	5	All	8-19	2.13 Whether or not a SUD system would be inappropriate in a particular circumstance is to be a matter of judgment for the local planning authority (para 82) but it must be having regard to what flood risk bodies consider to be “reasonably practical” (PPG para 82). The PPG also provides advice as to what is to be considered reasonably practical: “The judgement of what is reasonably practicable should be by reference to the technical standards published by the Department for Environment, Food and Rural Affairs and take into account design and construction costs”.	<p>Agreed but para 82 continues after what flood risk bodies consider to be reasonably practical to say “principally the lead local flood authority, including on what sort of sustainable drainage system they would consider to be reasonably practicable.”</p> <p>SBC is the Lead Local Flood Authority (LLFA) and in order to meet the principles set out in the technical standards, the SuDS Vision has suggested measures that the LLFA feel could be implemented in the NEV development area where it is feasible, without being an unreasonable burden on developers and they must be considered.</p>
1	6	All	8-19	2.14 The technical standards for sustainable drainage systems are linked to the PPG and were updated in March 2015 – in accordance with the Governments commitment to do so in the HCWS. They appear to be comprehensive and sufficient: “The technical standards provided by government relate to the design, construction, operation and maintenance of sustainable drainage systems and have been published as guidance for those designing schemes” (para 83). The technical standards make no reference to the means by which	<p>The Non Statutory Technical Standards for sustainable drainage systems are the standards SuDS will need to meet but they do not give guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p> <p>The CIRIA SuDS Manual is the main recognised national guidance document for SuDS and therefore the SuDS Vision must align with this document.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				SuDS should achieve the technical standards set out therein. No reference is made to source control as close as possible to source, to green roofs, to types of highway drainage systems.	
1	7	All	8-19	<p>2.15 The PPG also explores how design and construction costs are to be taken into account in determining whether specific proposals are “reasonably practical” and therefore appropriate:</p> <p>Para 83 indicates that it would not normally be reasonable to expect systems if more expensive than complying with building regulations or if a particular solution was sought when which was more expensive than alternatives: “In terms of the overall viability of a proposed development, expecting compliance with the technical standards is unlikely to be reasonably practicable if more expensive than complying with building regulations – provided that where there is a risk of flooding the development will be safe and flood risk is not increased elsewhere. Similarly, a particular discharge route would not normally be</p>	<p>The SuDS Vision “identifies the measures that must be investigated and implemented where feasible.” It does not require that these measures must be implemented.</p> <p>The SuDS Vision has suggested measures that the LLFA feel could be implemented, in certain circumstances where it is feasible, without being an unreasonable burden on developers and must be considered.</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				<p>reasonable practicable when an alternative would cost less to design and construct”</p> <p>Para 84 notes that the design costs that are to be taken into account in determining reasonably practical solutions will include “the opportunity cost of providing land for a drainage system above ground where the land utilised for the drainage system is not also utilised for another land” and enhanced maintenance costs arising from design”.</p> <p>Para 85 notes that the baseline for considering whether the maintenance and operational requirements of a particular SuDS scheme meet the policy expectation of being “economically proportionate” are defined “by reference to the costs that would be incurred by consumers for the use of an effective drainage system connecting directly to a public sewer.”</p> <p>2.16 All of this is consistent with the National Planning Policy Framework and its firm guidance to avoid burdening development with additional costs (see above) including specifically in</p>	

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				Supplementary Planning Documents.	
1	8	All	8-19	<p>2.17 The principal policy objectives of the Local Plan in relation to drainage and flooding are quoted as EN6 and NC3.</p> <p>2.18 The obligation in such policies is to provide a drainage strategy that ensure that run-off rates are attenuated to greenfield runoff rates (Policy EN6). The expectation and aspiration is for sustainable drainage systems although this is not a requirement.</p> <p>2.19 More particularly there is no detail in the Local Plan as to the elements that might comprise part of a Sustainable Drainage system.</p>	The Local Plan is a local policy document, not a guidance document so there will be no detail in the Local Plan as to the elements that might comprise part of a Sustainable Drainage system.
1	9	All	8-19	<p>2.20 HHT consider that the Draft SuDS SPD is wholly inconsistent with the existing policy context – in particular that which is set out very clearly at national level.</p> <p>2.21 As is demonstrated above the Draft SPD is highly selective in its references to national policy and guidance and omits large sections of national guidance as to what can reasonably be expected. In particular it largely ignores the detailed advice in the Planning</p>	<p>The NEV development area must be acknowledged as an area at risk of flooding. The NPPF can only consider development in areas at risk of flooding if it gives priority to the use of sustainable drainage systems.</p> <p>Whether or not a SuDS system would be inappropriate in a particular circumstance is to be a matter of judgment for the local planning authority but it must be having regard to what flood risk bodies consider to</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				Practice Guidance as to the circumstances where SuDS should be employed and in particular the guidance to ensure that SuD systems are “reasonably practical”, that their operational costs are “economically proportionate” and that this in practice means avoid imposing and anticipating solutions that result in costs that are in excess of those that might be expected as part of the now enhanced Building Regulations – or which might be anticipated as a result of connecting to existing drainage systems.	<p>be reasonably practical, principally the lead local flood authority, including on what sort of sustainable drainage system they would consider to be reasonably practicable.</p> <p>The SuDS Vision “identifies the measures that must be investigated and implemented where feasible.” It does not require that these measures must be implemented.</p> <p>The SuDS Vision has suggested measures that the LLFA feel could be implemented, in certain circumstances where it is feasible, without being an unreasonable burden on developers and they must be considered.</p> <p>Therefore we feel the SuDS Vision is consistent with national policy and guidance, including the NPPF and PPG.</p>
1	10	All	8-19	<p>2.22 None of the caveats in the PPG in terms of costs (including opportunity costs of land take and costs of management and maintenance) are acknowledged in the SPD, or described as factors in determining the design of SuDS.</p> <p>2.23 More particularly by seeking/requiring</p>	<p>The SuDS Vision “identifies the measures that must be investigated and implemented where feasible.” It does not require that these measures must be implemented.</p> <p>The SuDS Vision has suggested measures that the LLFA feel could be implemented, in certain circumstances where it is feasible,</p>

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				conformity with the CIRIA SuDS manual, the Draft SPD departs from the recently published Technical Standards that are described in the Planning Practice Guidance.	<p>without being an unreasonable burden on developers and must be considered.</p> <p>The CIRIA SuDS Manual is the main recognised national guidance document for SuDS and therefore the the SuDS Vision must align with this document.</p> <p>The Non Statutory Technical Standards for sustainable drainage systems are the standards SuDS will need to meet but they do not give guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p>
1	11	All	8-19	2.24 Instead the Draft SPD pushes dramatically and substantially beyond National Policy on SuDS and offers an unjustified, unqualified and unreasonable approach. This is particular the case in terms of the level of prescription that is pursued – particularly in respect of matters that will involve substantial additional cost over and above that which is reasonable.	Not agreed.
1	12	All	8-19	2.25 The approach should be to set out the national policy context fully, the technical standards to be adopted and the approach to assessing reasonable practicality and	The SuDS Vision “identifies the measures that must be investigated and implemented where feasible.” It does not require that these measures must be implemented.

Consultee Reference Number	Comment Number	Paragraph Number	Page Number	Comment	Officer response
				<p>economic proportionality in the design process. Instead the SPD appears to default to prescribing design solutions in isolation – in particular source control closest to sources or green roofs or highway drainage as “musts” and “requirements” without recourse to the overriding tests of SuDS systems in guidance.</p> <p>2.26 It is unnecessary to do so - as alternative forms of SuDS provision are capable of delivering the benefits sought. The suggested approach by the Council to the Sustainable Drainage at NEV, is inconsistent with the national policy direction and approach by proposing onerous requirements over and above that of National Policy or trend or practice and raises real concerns and risks in relation to design, implementation and deliverability. Whilst the SPD refers to HCWS161 in its support it delivers the opposite by resulting in excessive burdens on business, contrary also to the NPPF’s expectations of SPD’s and the detailed guidance in the Planning Practice Note.</p>	<p>The measures identified are measures that the Lead Local Flood Authority feels are required and must be considered and implemented wherever possible, due to the location of the NEV development area and existing on and off site flood risks.</p> <p>The proposed development islands are between and adjacent to the flood zones and will have linkages between which will cross the flood zones. The topography across the area is relatively flat and the drainage solutions especially if they are deep, are very likely to be affected by the existing hydromorphology.</p> <p>This is why shallow SuDS source control measures have been promoted in the SuDS Vision as to be affective, any attenuation features will need to be away from the flood zones 2 & 3, to ensure the drainage solutions will not be affected by the existing and future river flood levels.</p> <p>The Brookbanks FRA submitted by HHT acknowledges the need for source control</p>

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					<p>measures and has been incorporated within their drainage strategy.</p> <p>The LLFA feel that without the inclusion of source control measures, the development cannot meet the standards set out in the SuDS Technical Standards document, specifically paragraph S2 (and paragraph S3 where applicable), which is a must.</p>
1	13	All	8-19	2.27 On the matter of consistency with policy alone the SPD cannot proceed to adoption by the Local Planning Authority.	Not agreed
1	14	All	20-41	<p>3.1 The Draft DPD exceeds the scope that is acceptable in a Supplementary Planning Document for which guidance is clear. "Supplementary planning documents should be prepared only where necessary and in line with paragraph 153 of the National Planning Policy Framework.</p> <p>They should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development" (Planning Practice Guidance).</p>	Not agreed. The SuDS Vision "identifies the measures that must be investigated and implemented where feasible." It does not require that these measures must be implemented.
1	15	All	20-41	3.2 A NEV SuDS SPD does not appear to be suggested in the Swindon Local Plan nor in the latest Local Development Scheme. The	Due to the location of the NEV development area, SBC feel that the SuDS Vision SPD is required to give drainage guidance to

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				<p>necessity of such a document was not therefore evident at the comparatively recent adoption of the Swindon Local Plan.</p> <p>3.3 Given that there is clear guidance in the NPPF and the Planning Practice Guidance, HCWS and the DEFRA Non Statutory Technical Guidance the need for further guidance in the SPD is not established. That the Council has pursued the SPD appears to suggest that the SPD is intended to go beyond the clear national guidance that exists.</p>	<p>ensure that proposed applications provide surface water management strategies, in line with current guidance and legislation, to adequately manage surface water and not increase flood risk elsewhere.</p> <p>NPPF provides Planning Policy and the planning practice guidance “Flood Risk and Coastal Change” section gives guidance on when sustainable drainage systems should be considered or prioritised. The Non Statutory Technical Standards for sustainable drainage systems are the standards SuDS will need to meet to ensure flood risk is managed.</p> <p>These documents do not give guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p> <p>The CIRIA SuDS Manual is the main recognised national guidance document for SuDS and therefore the SuDS Vision must align with this document.</p>
1	16	All	20-41	3.4 HHT consider that the SPD fails the test of when SPDs should be prepared for the following reasons:	Not agreed due to the reasons explained above.

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				<p>There is no need for such a document given the clear guidance that exists; The document is drafting new policy – to prescribe particular solutions and approaches – that far exceed the obligations or expectations of national or even local planning policy; The prescribed solutions and approaches demonstrably add to the financial burdens of the development and that they do so unnecessarily as all drainage systems will meet the expected outcomes of policy in respect of flood risk, drainage, green infrastructure – without the level of prescription and costs assumed in the SPD.</p> <p>3.5 For these reasons also it is unsound to adopt the guidance set out.</p>	
1	17	All	42-45	<p>4.1 In section 2 above, HHT have set out a far fuller and more rounded summary and explanation of national and local policy in relation to SuDS than is evident in the Draft SPD.</p> <p>4.2 The fundamental conflict between the two is highlighted.</p>	<p>The SuDS Vision is not setting new policy, it is providing guidance to developers to ensure surface water drainage strategies / schemes align with current guidance and legislation and provide sustainable drainage to adequately manage surface water across the NEV area and not increase flood risk elsewhere.</p>

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				<p>4.3 This includes the use in the SPD of the CIRIA SuDS Manual as the principal point of reference rather than national or local policy or in particular the DEFRA Non-statutory technical standards for sustainable drainage systems which is set out in the Planning Practice Guidance as one means to establish whether a particular SuDS scheme is reasonably practical.</p> <p>4.4 The CIRIA SuDS Manual is not policy. It is not mentioned in the NPPF. It is not mentioned in the National Planning Practice Guidance Notes. It is not mentioned in the Swindon Local Plan.</p> <p>4.5 The SPD effectively adopts the CIRIA Manual as policy yet this is clearly not intended by Government in its careful consideration recently of policy towards SuDS (as is witnessed by the HCWS and subsequent updating of the relevant Planning Practice Guidance).</p> <p>4.6 Nor does the CIRIA SUDS Manual present itself as policy – simply as a compendium of Good Practice (page 11) and</p>	<p>NPPF provides Planning Policy and the planning practice guidance “Flood Risk and Coastal Change” section gives guidance on when sustainable drainage systems should be considered or prioritised. The Non Statutory Technical Standards for sustainable drainage systems are the standards SuDS will need to meet to ensure flood risk is managed.</p> <p>These documents do not give guidance on what SuDS are or which measures will deliver a successful SuDS scheme.</p> <p>The CIRIA SuDS Manual is the main recognised national guidance document for SuDS and therefore the SuDS Vision must align with this document.</p>

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				<p>recognising that national policy guidance takes precedence (page 9/14).</p> <p>4.7 The reliance placed on the SUDS Manual in the SPD elevates its role dramatically beyond that which was intended by Government, by CIRIA and which can be in any way justified. The problem is further emphasised by the lack of any effective qualification as to its use and where it sits in national policy terms.</p> <p>4.8 That the SPD employs the SuDS Manual selectively and misquotes or unfairly emphasises or exaggerates what the CIRIA Manual indicates makes the SPD less defensible and further from being an adoptable document.</p>	
1	18	All	46-89	<p>5.1 Notwithstanding the observations set out above some of HHT's greatest concerns relate to the preferences and the approaches being set out in the SPD. Far from exclusively but in particular HHT: the particular emphasis placed throughout the draft SPD on source control; the unreasonableness of the proposed highway</p>	<p>The proposed development islands are between and adjacent to the flood zones and will have linkages between which will cross the flood zones. The topography across the area is relatively flat and the drainage solutions especially if they are deep, are very likely to be affected by the existing hydromorphology.</p>

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				<p>drainage requirements, which would lead to excessive road widths and thereby inappropriate land take and disproportionate costs. The apparent preclusion of surface water storage in Flood Zone 2, which is unjustified and again unduly onerous.</p> <p>5.2 Perhaps the Councils approach towards source control is spelt out in more detail in relation to section 1.5 where SUDS management areas are proposed.</p> <p>5.3 It is here that the Council seeks to introduce “the principle of dealing with water as locally as possible”.</p> <p>5.4 No such principle exists within the HCWS, in the NPPF or in the Planning Practice Guidance.</p> <p>5.5 While the CIRIA SuDS Manual does note the benefits of managing water close to the source, this needs to be properly understood.</p>	<p>This is why shallow SuDS source control measures have been promoted in the SuDS Vision as to be effective, any attenuation features will need to be away from the flood zones 2 & 3, to ensure the drainage solutions will not be affected by the existing and future river flood levels.</p> <p>The Brookbanks FRA submitted by HHT acknowledges the need for source control measures and has been incorporated within their drainage strategy.</p> <p>The LLFA feel that without the inclusion of source control measures, the development cannot meet the standards set out in the SuDS Technical Standards document, specifically paragraph S2 (and paragraph S3 where applicable), which is a must.</p> <p>The benefits of source control measures are fully understood. Flooding caused by the impact of development has been witnessed in the Borough recently which was caused by regional ponds being located within an existing flood corridor from a watercourse, which considerably increased the runoff rate</p>

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					into the watercourse at the outfall point post development due to the allowable discharge rate being the accumulative greenfield runoff rate for the whole development area at this point. The pond outfalls were also affected by the existing flood levels from the watercourse, filling too quickly and overflowing to increase the runoff downstream. The EA had given their approval on the basis that the applicant would be providing source control measures but inclusion of source control measures was not taken forward at reserved matters.
2	1	All	All	I am writing on behalf of the Wilts & Berks Canal Trust, and this letter refers to both our letters of 5th May and 17th August, together with the three documents previously submitted, (as noted below) and one additional Technical Note: Observations of Drainage Plan, which is attached. Document 1: Summary of response Document 2: Non-technical summary, Flood protection Document 3: Technical Note	We will be providing a Technical response to Document 3: Technical Note separately.
2	2	All	All	The Trust is convinced of the vital importance of the built canal as part of the infrastructure within the NEV development acting as an	Unfortunately a strategic application had not been submitted for the whole NEV development area only individual

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				<p>integral part of the drainage management and flood prevention strategy for the NEV.</p> <p>We do not believe, based on our professional and expert view, that the current SuDS strategy, as outlined in your SuDS vision consultation, will prove fit for purpose: we further believe that the NEV development will, in all likelihood, be inundated with flood water if your current piecemeal strategy is not amended to include the built canal. Further we do not understand your reluctance to engage with us in the assessment of the canal as part of an overall NEV strategy, when the economic rationale for the canal as an integral part of the NEV flood defence could be offset by a smaller SuDS provision and the benefits that would ensue for the participating developers.</p> <p>In summary, our position remains as stated previously that the canal can become a defining and distinguishing feature of the NEV to the benefit and credit of all parties involved.</p> <p>The Trust urges SBC to take this opportunity of solving the drainage management and</p>	<p>applications for some locations have been submitted. Therefore the SuDS Vision cannot rely on a holistic solution for the whole NEV development area if it is unclear when, or even if, all land parcels of the NEV are to be put forward for development.</p> <p>We acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed as part of the application however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

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				<p>flood prevention problems of this area, already prone to flooding, by including the built canal as an integral part of the drainage and flood prevention strategy for NEV.</p> <p>Without the changes indicated above to your SuDS vision strategy, it is the Trusts expert opinion that you will be judged in the future to have acted against the interests of your community, and to have contributed to potential devastating flooding events within the NEV.</p>	
2	3	All	All	1.1.2 Swindon Borough Council (SBC) have prepared the Supplementary Planning Document, which aims to address stakeholders' comments regarding the development of the NEV. This Supplementary Planning Document does not add any new explanations or details with respect to drainage issues and only re-iterates the previous planning strategy.	Following Stakeholder consultation, the SuDS Vision SPD was updated to acknowledge that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development with reference to Policy EN11 of the Swindon Local Plan. Further information on drainage issues related to the development islands was added in the document with section 2.5 and the Annexes updated.
2	4	All	All	1.1.3 With respect to utilising the Wilts & Berks Canal for flood mitigation, SBC still maintain that drainage is an issue for each and every development within the NEV rather	SBC as the Lead Local Flood Authority (LLFA) can only consider a surface water drainage strategy for development when it is being submitted as part of a planning

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				than an overall solution for the NEV, which would be provided by the canal.	<p>application.</p> <p>SBC are not responsible for fluvial flood risk. The management of Fluvial flood risk is under the jurisdiction of the EA. As the canal will be a raised structure in the flood plain, the EA would need to consider the feasibility of the canal with regards to flood risk, to ensure it will not increase the flood risk elsewhere as well as it being a flood defence structure. In order for this to be considered in relation to the NEV development proposals, we feel that full plans for the canal will need to be submitted as part of a planning application.</p>
2	5	All	All	<p>1.1.4 SBC continue to refer to their Sustainable Drainage System (SuDS) Vision document.</p> <p>Although well-meaning, the practical design, construction and maintenance of SuDS is fraught with difficulties. As such, SuDS cannot be relied on to provide adequate flood protection which caters for differing rainfall and drainage channel conditions.</p>	<p>There are a vast number of measures that can be combined to provide an adequate SuDS scheme with a number that are practical to design, construct and maintain to manage surface water.</p>
2	6	All	All	<p>1.2.1 The environmental impact assessment of the NEV developments acknowledges that there will be an increase in the rainfall run-off</p>	<p>All developments are required to discharge at or below greenfield runoff rates. If surface water is managed as close as practical to</p>

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				<p>from house roofs, roads, pavements and other impermeable hard surfaces. It is proposed that this increased quantity of drainage flow is to be catered for by Sustainable Drainage Systems (SuDS). However such systems are to be designed in a piecemeal manner considering each particular development in isolation. The aggregate effect of the overall increased drainage from all the planned developments has not been fully investigated. In addition SuDS require considerable maintenance to ensure that they perform properly and as yet the responsibility and associated costs for this maintenance is not defined.</p>	<p>where it falls on the ground, water can be controlled easier and discharged to existing watercourses throughout the management train rather than relying upon a single point of discharge with a accumulative greenfield runoff rate for the whole area, which will be a significant increase in peak flow at that point.</p> <p>If the canal is proposed to be delivered as the drainage solution for the NEV development area, drainage features will still be required to convey water to the canal and deal with other aspects such as maintaining water quality and therefore there will still be maintenance for these aspects on top of the maintenance required for the canal. Certain SuDS measures can be incorporated to be an integral part of a development, be designed for ease of maintenance, not only providing the attenuation requirements but maintaining water quality and biodiversity which need to addressed by development to be in accordance with the Swindon Local Plan and national policy.</p>
2	7	All	All	1.2.2 In accordance with the SBC's planning policy, the proposed New Eastern Villages are	The revised draft SPD and Masterplan show the main development islands to be outside

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				<p>to be constructed on artificially raised islands within the River Cole floodplain such as to be above the predicted flood levels. However the predicted flood levels are unknown. The effect of raising the ground for the NEV development will constrict the floodplain, removing flood storage volumes thus increasing flood depths.</p>	<p>of the flood zones 2 and 3. There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level.</p> <p>The Environment Agency (EA) already have detailed modelling information for the NEV and Flood Zones 2 & 3 are based on these flood modelling extents, Flood Zone 3 being the 1 in 100 year flood extent and Flood Zone 2 being the 1 in 1000 year flood extent. Therefore the existing ground levels on the proposed development Islands are very likely to be above the 1 in 100 plus climate change level.</p> <p>There will be a need for strategic infrastructure to be in flood zones 2 and 3 which may need to be above the 1 in 100 year plus climate flood level. The flood levels, which will vary across the NEV development area, can be obtained from the EA.</p>
2	8	All	All	1.2.3 All the drainage of the River Cole and the tributaries feeding it from the downs is channelled towards one outlet, which is Acorn	The revised draft SPD and Masterplan looks to steer development outside of the flood zones 2 and 3 hence, outside the 1 in 1000

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				<p>Bridge, a box culvert under the A420 trunk road and an arched brick culvert under the main railway linking London and the west. Acorn Bridge culvert is believed to be close to capacity and has previously been overwhelmed in July 2007 with flooding of the A420, properties near South Marston and surrounding farmland. With the predicted increase in peak drainage flows from the proposed developments the culvert will form a significant bottleneck, which will cause floodwaters to back-up potentially inundating the SuDS ponds and thence properties and infrastructure within the New Eastern Villages.</p>	<p>year flood extent. The SuDS Vision looks to ensure that no surface water attenuation features will be within flood zones 2 and 3.</p> <p>Where strategic infrastructure is necessary in flood zones 2 and 3, proposals must provide compensation for loss of flood plain and demonstrate that flooding will not be increased elsewhere.</p>
2	9	All	All	<p>2.1.2 SuDS will not function properly in the impermeable Kimmeridge Clay soils of the River Cole floodplain and the attenuation ponds will nearly always be waterlogged. There are many examples of existing ponds in the floodplain which hardly ever drain away even in the summer months.</p> <p>2.1.3 Because of these low seepage characteristics, the size of the SuDS attenuation ponds will need to be considerably enlarged to cater for the 1% probability storm event especially if there are</p>	<p>SuDS are not just measures that rely on infiltration, there are a vast number of different drainage solutions, which can be selected at a location for their suitability, and can be combined to provide an adequate SuDS scheme.</p> <p>Yes we agree that the river flood plain will be waterlogged for a long period, that's why the whole principle of the SuDS Vision is to promote source control measures to ensure any attenuation features are well away from the flood plain and are shallow so they are</p>

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				back to back storms (i.e. the SuDS pond is inundated and a second storm occurs).	not affected by the flood plain levels.
2	10	All	All	2.1.4 The design of SuDS is based on the SuDS Manual CIRIA C697, which allows for subjective hydrological analyses for a particular location. It is most likely that developers will apply a minimalistic approach to their design.	<p>The SuDS Vision now refers to the updated SuDS Manual C753. The SuDS Manual is a guidance document on providing SuDS to manage surface water, it does not provide guidance on River flows or fluvial flooding.</p> <p>Surface water flooding and fluvial flooding do not always happen at the same time and will vary considerably in duration. This is why surface water needs to be dealt with separately to ensure it is managed adequately.</p> <p>The SuDS Vision is promoting source control measures to ensure any attenuation features are well away from the flood plain and are shallow so they are not affected by the flood plain levels.</p>
2	11	All	All	2.1.5 In designing SuDS, developers will only consider the drainage emanating from their particular development area and will assume free drainage downstream of the SuDS attenuation ponds. This is frequently not the case and floodwater levels downstream can back up and throttle the release structure	The example used was a constructed solution reliant on traditional drainage discharging to regional ponds being located within an existing flood corridor from a watercourse. SBC did not approve the surface water management strategy which was submitted as part of the planning

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				from the SuDS ponds, which then overtop. There was an example of this in the Badbury Park Estate on 11th May 2016 (see Photos 1 and 2).	<p>application which was given consent through the appeal process. At the time of the application, SBC as the Lead Local Flood Authority (LLFA) was not a statutory consultee on planning applications for surface water drainage.</p> <p>The whole principle of the SuDS Vision is to promote other measures instead of traditional drainage discharging to regional or strategic attenuation features.</p>
2	12	All	All	<p>2.1.6 To determine the elevations and size of the inlet and outlet structures and attenuation pond capacity, developers will need the overall design parameters. These can only be obtained from a holistic hydrodynamic flood study of the whole catchment for various scenarios with the proposed NEV development islands superimposed on the natural River Cole floodplain. If this is not carried out, each developer will be estimating his particular parameters resulting in a disjointed design, which is likely to fail.</p>	<p>The Environment Agency (EA) already has detailed modelling information for the NEV and developers can obtain flood levels for different flood extents from the EA.</p> <p>The SuDS Vision requires that attenuation features are outside of flood zones 2 and 3 their outfalls are above the 1 in 100 year plus the allowance for climate change river flood levels.</p> <p>Flood Zones 2 & 3 are based their flood modelling extents, Flood Zone 3 being the 1 in 100 year flood extent and Flood Zone 2 being the 1 in 1000 year flood extent.</p>

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					The revised draft SPD and Masterplan looks to steer the main development islands outside of the flood zones 2 and 3. There will be a need for strategic infrastructure to be in flood zones 2 and 3 and the EA will need to be consulted on any infrastructure within these flood zones to ensure they will not increase the flood risk elsewhere.
2	13	All	All	2.1.7 The inlet and outlet structures from the ponds will need regular cleaning and maintenance and this is too frequently overlooked. There is no nationwide policy for covering the cost of maintaining SuDS and the responsibility for this is always unclear. The SuDS Vision document suggests various maintenance funding methods such as through a service charge levied on residents or through a commuted sum deposited by the developers with a maintenance company but these have problems.	<p>This is an issue for all proposed drainage systems for developments, whether they include SuDS principles or not.</p> <p>It is the responsibility of the developer to ensure that a suitable maintenance management plan is provided for future maintenance for any proposed drainage ensuring that an adequate maintenance model can be implemented.</p>
2	14	All	All	2.2.2 The proposed alignment of the Wilts & Berks Canal is along the floodplain of the Liden Brook a tributary of the River Cole. Apart from the development at Redlands, the canal embraces all the New Eastern Villages development areas to the North West, thereby	The revised draft SPD and Masterplan looks to steer development outside of the flood zones 2 and 3 hence, outside the 1 in 1000 year flood extent. The SuDS Vision looks to ensure that no surface water attenuation features will be within flood zones 2 and 3.

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				shielding them from drainage flows and artesian groundwater emanating from the North Wiltshire Downs in the south east. In effect the canal embankment forms a flood protection barrier.	<p>Where strategic infrastructure is necessary in flood zones 2 and 3, proposals must provide compensation for loss of flood plain and demonstrate that flooding will not be increased elsewhere.</p> <p>Therefore, this ensures that the development areas will not be affected by flooding originating from the Liden Brook and also other main rivers flowing through the NEV development area.</p>
2	15	All	All	<p>2.2.3 Under high rainfall conditions storm flows are prevented from rushing into the River Cole due to the throttling effect of the cross drainage culverts beneath the canal. Instead the canal embankment would act as a dam creating attenuation ponds. These ponds provide storage for the high peak flows, hence protecting the New Eastern Villages from excessive flood waters, which would otherwise drown the SuDS attenuation ponds.</p> <p>2.2.4 To further enhance the storage volume of the attenuation ponds formed along the canal embankment, channels can divert surplus floodwater by gravity from the attenuation</p>	<p>Where any strategic infrastructure is necessary in flood zones 2 and 3, including the canal, proposals must provide compensation for loss of flood plain and demonstrate that flooding will not be increased elsewhere.</p> <p>SBC are not responsible fluvial flood risk. The management of Fluvial flood risk is under the jurisdiction of the EA. The EA will need to consider the feasibility of the canal with regards to flood risk, to ensure it will not increase the flood risk elsewhere as well as it being a flood defence structure. In order for this to be considered in relation to the NEV development proposals, we feel that</p>

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				ponds to the next lowest canal pound.	full plans for the canal will need to be submitted as part of a planning application.
2	16	All	All	2.2.5 Once diverted into the canal, flood flows can be conveyed northwards via the canal around each lock from pound to pound and through the proposed new culvert taking the canal under the railway where excess flow can be released into the River Cole. In effect the canal provides a by-pass to the bottleneck formed by Acorn Bridge thereby protecting the A420 from flooding.	If the Canal is to provide a drainage solution to the NEV, it will need to be demonstrated that the flow rate and volume of water to be discharged into the River Cole will not exceed existing greenfield runoff rates for all events.
2	17	All	All	2.2.6 Note that Annex A of the SuDS Vision document refers to the Trust as the Wilts and Dorset Canal Trust; this needs correcting.	Noted and to be amended
2	18	All	All	3.1.1 The advantage of the canal over the proposed SuDS design is that it protects the whole NEV development area rather than each individual development only and enables the localised SuDS attenuation ponds to be minimised. 3.1.2 If a hydrodynamic numerical model of the River Cole catchment with and without the proposed NEV development is undertaken, it would be fairly straight forward to add the Wilts & Berks Canal to the model and	The Environment Agency (EA) already have detailed modelling information for the NEV and Flood Zones 2 & 3 are based on these flood modelling extents, Flood Zone 3 being the 1 in 100 year flood extent and Flood Zone 2 being the 1 in 1000 year flood extent. Therefore the existing ground levels on the proposed development Islands are very likely to be above the 1 in 100 plus climate change level. If the canal is delivered to provide protection from the River Cole catchment, SuDS will

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				<p>demonstrate its flood mitigation potential. If this study were to be undertaken by the developers they would recoup the cost of the study since, by promoting the canal as a flood barrier, they could reduce the size of their SuDS requirements.</p>	<p>still be required to manage surface water from the developments.</p> <p>Surface water flooding and fluvial flooding do not always happen at the same time and will vary considerably in duration. This is why surface water needs to be dealt with separately to ensure it is managed adequately.</p> <p>The SuDS Vision is promoting source control measures to ensure any attenuation features are well away from the flood plain and are shallow so they are not affected by the flood plain levels.</p>
2	19	All	All	<p>3.1.3 In addition the developers will be able to verify that their individual SuDS designs are viable, hence minimising their future liabilities. SBC could offer incentives for developers who are prepared to collaborate with one another to optimise the overall flood protection works for the NEV.</p>	<p>Surface water flooding and fluvial flooding do not always happen at the same time and will vary considerably in duration. This is why surface water needs to be dealt with separately to ensure it is managed adequately.</p> <p>The SuDS Vision is promoting source control measures to ensure any attenuation features are well away from the flood plain and are shallow so they are not affected by the flood plain levels.</p>

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2	20	All	All	3.1.4 The construction of the Wilts & Berks Canal through the NEV development is advantageous to all parties; SBC, the developers, EA, residents, landowners, farmers and the WBCT. The Wilts & Berks Canal Trust recommends the participation of developers and other interested parties to form the canal as part of the construction of the New Eastern Villages.	The EA will need to consider the feasibility of the canal with regards to flood risk, to ensure it will not increase the flood risk elsewhere as well as it being a flood defence structure. In order for this to be considered in relation to the NEV development proposals, we feel that full plans for the canal will need to be submitted as part of a planning application.
3	1	All	All	<p>I have been a member of the Wilts & Berks Canal group for nearly 30 years and was the Swindon Branch chairman for more years than I can remember. I had frequent dealings with the council over many years and our group grew considerable support among local residents and councillors for the aim of restoring the canal in the Swindon area, with the ultimate goal of full restoration and connection to the national waterways.</p> <p>It was repeatedly emphasised to me by council officers that restoration of the original line through Swindon town centre is wildly unrealistic and that the best solution was to identify and protect a route to the south. This we did as far as we could. It was also made clear to me that the only likely opportunity for</p>	<p>We acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

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				<p>re-construction of the canal would be development led. The Eastern Villages development is that opportunity. It is imperative that this is not lost.</p> <p>1. A built canal offers potential for drainage and flood relief which are the goals of the Sustainable Drainage plan</p> <p>2. Restored and active canals in towns and cities are generally highly beneficial to their local communities economically, socially and environmentally. If well thought out and realised the Wilts & Berks Canal would add unique and desirable character to the NEV and is likely to increase property values in that area, with knock-on benefits for the rest of Swindon.</p> <p>Therefore I am extremely disappointed that, despite an overwhelming majority of comments in support of a new canal to be included in the Eastern Villages, this has still not been included as required part of the development infrastructure, to be funded by the developers.</p> <p>Please will you reconsider, in the light of the</p>	

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				<p>positive comments you have already received and of the wonderful opportunity this offers to the local community (as well as the wider population of canal users and environmentalists).</p> <p>Please also bear in mind that this opportunity offers the single greatest potential for restoring the canal in the Swindon area and is probably unrepeatable, so must not be overlooked or dismissed lightly. Crystallise this opportunity and you will be thanked for decades by thousands of residents, business people, canal users and environmentalists.</p>	
4	1	All	All	<p>Thank you for consulting us on the above draft SPD. As you acknowledge within the document the responsibility for managing flooding from surface water lies with yourselves as Lead Local Flood Authority and as such we have no specific comments to make on this document. We welcome the recognition of the wider benefits of sustainable drainage systems including the enhancements they can bring to water quality and biodiversity in line with the Water Framework Directive.</p>	Noted

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5	1	Box	3	It must be remembered that when providing an outline planning application specific details about layout, provision of infrastructure etc. may not have been worked up and so to have a “complete and functional” design may be impractical. Therefore, any submission regarding SuDS should be appropriate to the nature of any planning application submitted.	The text provides flexibility, whilst ensuring that each application will be assessed on its own merits.
5	2	1.3	3	We do not think that there is any specific tie up between the policy requirements of EN11 and SuDS. Whilst we acknowledge that part of the SuDS solution may involve drainage into the canal this does not have an implication for the heritage issues identified under EN11 and the reference to this should be deleted.	Disagree. The addition of a canal to the NEV could have a significant impact on the existing and proposed drainage systems; as a result, the safeguarded alignment must be considered in the context of the wider strategic allocation.
5	3	1.5	6	We believe that this should be amended to suggest that the acceptability of traditional gulley and pipe systems will depend upon the overall specific scheme being promoted. In certain circumstances it might be necessary to adopt such features within an overall drainage solution. We note that in the following paragraph reference is made to the fact that shallow above ground conveyance systems should be used. However, again, this may not always be appropriate and it may	Disagree. Statement indicates that SBC will not accept a drainage strategy that seeks to use traditional gulley and pipe systems discharging to large attenuation features close to the final discharge point as this will not meet policy requirements. Traditional pipe and gulley solutions may be more appropriate in certain circumstances, however they will need to be in accordance with other SuDS systems to ensure they meet policy requirements.

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				be necessary to use gulley and pipe systems, where, for example, a conveyance path has to pass under existing or proposed infrastructure.	
5	4	Section 2	8-19	<p>Generally we consider that this section is far too long and goes much further than is needed to set out guidance regarding SuDS provision in the NEV.</p> <p>In short, the section addresses much wider issues of landscape, urban character and design and provision of open space than is needed for a document which purports to address SuDS vision for the NEV.</p> <p>Whilst it is acknowledged that SuDS will have an interrelationship on environmental matters and physical design solutions we consider that the document, in overall terms, strays far too deeply into other considerations which would be much better confined to the NEV Masterplan which is being prepared by the Council.</p> <p>For example, much is made of the need for the NEV to develop well defined individual villages, to have regard to the wider landscape etc. These are all much wider concepts and should not be the subject of the</p>	SuDS features are integral to the development and must be considered in the context of the other design and site constraint considerations. As a result, the references to other environmental matters is considered appropriate.

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				<p>SuDS Vision document. Accordingly we object to this section of the document and suggest that pages 10, 11 and 12 should be retained in so far as any of these documents refer to SuDS matters and that section 2.4 “Key Principles of the SuDS Vision” should be retained subject to the following amendments:</p> <ul style="list-style-type: none"> • Bio-diversity and Ecology, third bullet point – add on “where possible” at the end. • Bio-diversity and Ecology, fourth bullet point – add on “where possible” at the end. • Bio-diversity and Ecology, fifth bullet point – add on “without mitigation” at the end. • Health and Safety, second bullet point – add on “where possible” at the end. • Health and Safety, sixth bullet point – add on “where possible” at the end. 	
5	5	2.5	14-19	<p>We object to the inclusion of these matters which deal with much wider design concepts. This section should be deleted. In particular, with reference to sub-section 2.5.7 “Redlands”, we object to the reference that Redlands will be a “small hamlet”. We also object to the suggestion that it should be a</p>	<p>The section on character villages seeks to provide guidance on the characteristics sought at each island, as outlined within the NEV SPD. The intention is not provide a prescriptive section on the detailed design concepts for each development island and these sections will be amended where</p>

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				<p>discrete scheme. Rather it should be integrated with the local landscape. We also do not see that SuDS has a role to play in reducing air pollution.</p> <p>Finally we object to the suggestion that SuDS, particularly the other design features, should be considered to have a role in protecting “the character and identity of nearby Wanborough, Bishopston and Bowton”. There is no suggestion that these settlements will be directly affected by the development at Wanborough and, in any event, these matters can be addressed by other design matters and should not be included as a reference in the SuDS document.</p>	appropriate.
5	6	3.1	21	<p>We suggest that this paragraph refers to existing sub-section 2.4 rather than the whole of Chapter 2. We also suggest that the words “and any other relevant policies” in the penultimate line be deleted since this is too loose and does not provide certainty to any developer or designer as to how the Council will interpret other policies. If the Council believe that other policies are relevant they should be named so that they can be assessed at the appropriate time.</p>	<p>The report seeks to identify the key policies relevant to proposals. When determining applications, all policies within the development plan are material and such must be considered.</p>

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5	7	3.1 para 3	21	We consider that some infrastructure may have to be constructed within Flood Zones 2 and 3 in order to provide connectivity between development islands. This will be consistent with other elements of the NEV policy area.	This element of the document is considered to comply with the requirements of Policy EN6. Document acknowledges that certain types of development will be permitted in Flood Zones 2 and 3.
5	8	Table	24	We believe that rainwater harvesting green roofs would not be appropriate for residential properties. This is not current practice for major housing developments and this expectation should be deleted. It will provide a substantial cost to a development which is already heavily burdened by infrastructure requirements. We also consider that the reference to rainwater recycling from hardstanding associated with residential development should not be mandatory since it already represents a significant cost to the provision of development.	The table suggests measures that the LLFA feel could be implemented, in certain circumstances where it is feasible, without being an unreasonable burden on developers and must be considered. Table has been amended for further clarity.
5	9	Table	24-27	<p>We consider that the following changes should be made.</p> <ul style="list-style-type: none"> Lightly trafficked roads; this is an imprecise definition and it can be difficult to define on individual schemes. We suggest that the text states that consideration should be given to the feasibility of over the edge drainage. Other public highways; again the 	<p>Noted. Amendments to table for additional clarity.</p> <p>Lightly trafficked roads to Tertiary or as appropriate (move to 2nd)</p> <p>Public rights of way (5th)</p> <p>Other public highway to primary and</p>

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				<p>reference to an overland conveyance system should only be considered where it is feasible to do so; this should be clarified in the text.</p> <ul style="list-style-type: none"> Car parks – public/communal parking areas; again above ground conveyance systems should only be introduced where it is feasible to do so. <p>Public open space; again the consideration to an above ground conveyance system should only be introduced where it is feasible to do so.</p>	<p>secondary roads (1st)</p> <p>Car parks etc (3rd)</p> <p>Public open space (6th)</p> <p>Underpass (4th)</p>
5	10	Bullet 6	37	The comment should refer to the feasibility of conducting such an approach.	It is vital that existing drainage features are considered prior to the initial design of the proposed development. These features must be utilised and enhanced where possible.
5	11		37	It is incumbent upon the local planning authority to ensure that relevant departments within the authority are prepared to adopt SuDS features as part of open space or highway adoption procedures.	In accordance with the PPG, the applicant must make arrangements for the future maintenance of SuDS as well as open space and highways, in the event that the Council does not formally adopt.
5	12	Fig 25	38	We consider the requirement to provide a construction phasing plan, maintenance plan, adoption plan to be unduly onerous and these matters should be delayed until the detail design stage.	Figure 25 to be removed.

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5	13	1	41	The Council should expect the highway authority to allow connections to the existing highway drainage system. It is incumbent upon all authorities to assist in providing SuDS features if they are a requirement of planning permission. We would also comment that other SuDS infrastructure in areas to be adopted should be taken by the local planning authority.	The applicant must make arrangements for the future maintenance of SuDS as well as open space and highways, in the event that the Council does not formally adopt.
5	14	All	42-44	The Council should fund adopted SuDS maintenance through Council Tax payments. Similarly the highway authority would also fund maintenance of infrastructure in the highway. The highway authority should adopt these features.	The applicant must make arrangements for the future maintenance of SuDS as well as open space and highways, in the event that the Council does not formally adopt.
5	15	All	Village Specific Data	We do not consider that it is appropriate to include these matters within the SuDS document. These should be included in the Masterplan document. We also do not think it is appropriate for this section to define open space requirements which again should be the matter of detailed discussions with the local planning authority in accordance with open space standards. These sections should be deleted in their totality.	The information in this section provides additional details to the masterplan. References to open space suggest opportunities rather than list requirements.
6	1	Section 1	1-7	I welcome the comments made in the Introduction on page 3 regarding the	We acknowledge that a canal can provide some of the main principles of an overall

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				<p>opportunity presented by the proposed canal line to be part of the arrangements for attenuating water flows. I am not clear, following the consultation on the Eastern Villages Masterplan in April (which did not explicitly require provision of the completed canal) whether it is now proposed that the line of the canal, and the necessary structures such as bridges, will be constructed as part of the development of the New Eastern Villages. Obviously if the canal is to perform a land drainage function it needs to be constructed at an early stage - and I would very strongly encourage Swindon Borough Council to require this to be done by and at the expense of the developers.</p>	<p>SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>
6	2	All	All	<p>I will also comment in the consultation regarding the New Eastern Villages (NEV) Planning Obligations - Revised Draft Supplementary Planning Document. I note that it refers to the canal within the relevant villages but it is not clear to me that this</p>	<p>It is not within the brief of the NEV SuDS Vision SPD to assess the canal river alignment.</p>

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				means the continuous canal channel and all structures in the areas outside the curtilages of the villages. I feel strongly that the complete route of the canal, and its structures, should be formed from the southern end where the canal is projected to cross Purley Road to the north-eastern extremity - immediately south of the railway line where it crosses the A420.	
6	3	2.5.5	17	I note on page 17, section 2.5.5 regarding Lower Lotmead, that the Wilts & Berks Canal Trust is identified to input their views regarding the formation of SUDS features linking with the canal. It is obviously important that the linkages do not lead to siltation of the canal channel which would impact on the use of the canal for navigation. I would want this point to be explicitly mentioned - and the responsibility for the cost of any silt removal should not fall to the Canal Trust unless the developer has previously lodged funds with the Canal Trust to cover this expenses on a continuing basis.	Measures will be required to maintain water quality so if the canal is to be provided as the overall drainage solution, it will need to be demonstrated that water quality and other requirements from local and national policy are addressed.
6	4	2.5.6	17-18	I refer to page 17-18, section 2.5.6 regarding Foxbridge. My comments about the connections between SUDS and the canal in the preceding paragraph also apply.	Measures will be required to maintain water quality so if the canal is to be provided as the overall drainage solution, it will need to be demonstrated that water quality and

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					other requirements from local and national policy are addressed.
7	1	All	All	<p>We welcome the inclusion of way biodiversity has been incorporated into the SUDS Vision, but have no detailed comments to make.</p> <p>However I note that there does not seem to be any obligation on the developer to fund any construction of those parts of the route which pass through their development zone, as was the case in the Wichelstowe development. I believe strongly that the restored Wilts & Berks Canal is a major strategic asset for Swindon, and that this (as the only remaining development from the Master Plan to take place on the proposed canal route) is an important opportunity to make progress towards this goal.</p> <p>I note that the SuDS SPD mentions that it is possible, where local topography allows, that the canal become part of the integrated drainage solution for the area, which I welcome. However I would note that if there is no obligation for the developer to construct the local length of the canal, this would not in fact be possible; as far as I'm aware the Wilts</p>	<p>We acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>

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				<p>& Berks Canal Trust remains a long way away from being able to construct this length themselves via voluntary labour. Without an obligation to build the canal as part of the development, there is a strong possibility that the developer will favour drainage solutions which are cheaper, but which do not contribute to Swindon in a strategic fashion, and that therefore this will be an opportunity missed.</p> <p>One of the other major benefits of the restored canal will be the tourist implications for Swindon as a whole, both in terms of boating holidaymakers and in terms of the canal being a leisure beauty spot which can be visited in its own right. I am worried that the current plan does not best facilitate these benefits. For example, the proposed sites of the village community/retail centres in the Lotmead, Lower Lotmead and Foxbridge villages (those villages through which the canal route passes) are not currently planned to be next to the canal. It would be an ideal opportunity for these centres to feature moorings so that some of their retail/leisure provision (for example pubs, cafes and</p>	

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				convenience shops) can cater to canal tourists, and to give these centres considerable character. I would strongly suggest moving these centres to a location such that they can benefit from the proposed canal, and so that they can enhance the canal experience itself.	
7	2			Finally, and on an unrelated subject, I'd like to comment with my disappointment at the chosen location of the new Park & Ride facility. I would suggest that if this Park & Ride were located to the south of the development area (e.g. Foxbridge) the Park & Ride would also be able to service visitors coming in from both the M4 and the A419 (without adding traffic to the White Hart junction), as well as servicing local NEV traffic. The proposed location will be very unlikely to attract traffic from outside of the NEV population; as Swindon Park & Rides have historically struggled to generate enough business to remain commercially viable, I would suggest that there is a serious risk of the current proposed location failing to last.	Not relevant to SuDS Vision SPD.
8	1	All	All	We welcome the inclusion of way biodiversity has been incorporated in the SuDS Vision,	Noted.

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				but have no detailed comments to make.	
9	1	All	All	<p>Thames Water recognises the environmental and economic benefits of surface water source control/SuDS, and encourages their appropriate application, where it is to the overall benefit of their customers. Thames Water and their AMP6 Alliance (Eight2O) are working with the Council on a catchment drainage study. Thames Water therefore support the SUDS Vision for New Eastern Villages.</p> <p>Limiting the opportunity for surface water entering the foul [and combined] sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SUDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to:</p>	Noted.

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				<ul style="list-style-type: none"> • improve water quality • provide opportunities for water efficiency • provide enhanced landscape and visual features • support wildlife • and provide amenity and recreational benefits. 	
9	2	Blue box	22	<p>Page 22 of the draft SPD sets out a definition of drainage hierarchy as: “The following receptors must be considered for surface runoff in order of preference: 1. Discharge by infiltration into the ground (assumed not to be practical within the NEV) 2. Discharge to an open surface water body 3. Discharge to a surface water sewer 4. Discharge to a combined sewer”</p> <p>This definition doesn’t include any SuDS storage options which should form part of the hierarchy i.e.</p> <ul style="list-style-type: none"> • store rainwater for later use • attenuate rainwater in ponds or open water features for gradual release to a watercourse • attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse 	<p>This is now on page 39 but it is referring to solely the final discharge point and not the SuDS measures. The SuDS options mentioned are provided in the table on page 37.</p>

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				· discharge rainwater direct to a watercourse	
9	3	2nd	22	There also appears to be a typo in the definition title i.e. it should be 'Definition' rather than 'Destination'.	Noted. Document amended.
9	4	Blue box	22	<p>The page 22 definition also states: "Discharge to a foul sewer will not be permitted, and discharge to combined sewer will only be permitted if:</p> <ul style="list-style-type: none"> • it can be shown that there are no other practicable options for discharge of surface water runoff • Thames Water have confirmed that they have capacity within the combined drainage network, and • It can be demonstrated through modelling that that there will be no increase in the frequency or volume of discharge from intermittent storm discharges, or any increase in foul flooding downstream of the development site" <p>Thames Water agree with this statement, but it needs to be recognised that most of the sewer network in the area is foul (rather than combined) and as such there will be very limited opportunity for connecting surface water to a combined system.</p>	Noted.

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10	1	All	All	South Marston Parish Council wishes to contribute further to the development of the NEV SuDS Strategy through this second draft SPD consultation. We remain disappointed that SBC Flood Authority personnel did not engage with us as requested following the Local Plan enquiry in 2014 and following the initial consultation in January 2016. This would have avoided having to make the further comments below to ensure their understanding of surface water flow across the South Marston parish area.	Noted.
10	2	Table	38	Timing of SuDS proposals We are pleased to see that timing of SuDS design as stated in the table on page 38 includes the timing of outline design of SuDS methods and maintenance approach. However, such a SuDS design document needs to take account of road and ROW networks within any planning application in a way that maximises opportunities for roadside channels and culverts to divert or disperse surface water into swales or basins. The complete highways network may not be available at outline application stage. It may therefore be appropriate for the draft SPD to state that, in such cases, the detailed SuDS	Noted. The process outlined within the SPD is considered to be sufficient to adequately address these concerns. As part of the planning process, relevant conditions will be recommended where appropriate to ensure sufficient detail is provided at the reserved matters stage.

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				design must be a reserved matter on grant of outline permission or submitted at masterplanning stage. It is important that such detailed SuDS proposals should be fully consulted upon and agreed <u>prior</u> to formal submission of any detailed planning application.	
10	3	2 nd	19	<p>We object to the South Marston summary statement on page 19: <i>'The village of South Marston was affected by flooding in July 2007 and the EA surface water flood maps illustrate that there are a number of surface water flow routes through the proposed development site. <u>Retaining existing drainage features through the proposed green corridors leading to South Marston Brook and the application of SuDS such as swales and attenuation basins, will maintain and control the flow routes through the development to ensure the flood risk is not increased elsewhere (p19)'</u>.</i></p> <p>This second sentence is incorrect and, through lack of understanding of water flow across the area, is actually in conflict with later statements in Section 3 of the strategy.</p>	<p>Agreed, plans have been updated to show the EA surface water flood maps and arrows have been removed to avoid misinterpretation. Text has been amended for clarity. The Masterplan at this stage is indicative and the layout of the proposed development areas will need to ensure that all surface water flow routes are maintained through it. We have been liaising with the consultant working on behalf of the applicant for the South Marston Expansion and the Rowborough developments and have asked them to demonstrate that all surface water flow routes are maintained safely through these development areas to ensure the development will be in accordance with Section 3 of the SuDS Vision.</p>

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				<p>We believe that some of the existing flow routes will no longer be appropriate since they cut through the individual development parcels and will simply increase the overall risk to new and existing properties en route. It would make more sense to develop SuDS measures that fully utilise the retained green infrastructure within the development and roadside attenuation alongside new road or cycleway construction. Such a strategy could be used to divert, store or disperse surface water flow to where it enhances the value of green infrastructure and carries less flood risk to properties.</p> <p>Our proposal is consistent with generic statements in Section 3: <i>‘Developers must demonstrate that their proposals maximise the opportunities for improving drainage in the area and reduce the risk of flooding to neighbouring communities where practicable. This requirement is particularly pertinent to any proposed development areas and their associated infrastructure where there are existing watercourses or flow routes flowing through them which provide a drainage function to neighbouring land and sufficient</i></p>	

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				<p><i>corridors must be provided to maintain, control and enhance existing flood flow routes to reduce the risk of flooding to existing residential areas. Opportunities must be thoroughly investigated and unless proved impracticable they must be incorporated into the relevant outline planning application(s) for the NEV (p23)'. </i></p> <p>Relevant South Marston areas adjoining NEV development which lie in the path of existing surface water routes include Thornhill Industrial Estate, Ash Gardens, Manor Farm and Farmyard, Southview Cottages, Red House, Manor Cottages and South Marston Farm.</p>	
10	4	Table	26	<p>Public rights of way <i>'Public rights of way and cycle routes should be drained over the edge wherever feasible, without collecting flows. Over the edge drainage is preferred, although special consideration should be given at low points, or flat areas to ensure highway flooding does not occur (table page 26)'</i></p> <p>We propose the addition here of the relevance of culverts. Within South Marston</p>	<p>This SPD seeks to provide guidance on the preferred SuDS methods and techniques. Infrastructure will be designed on a case by case basis and therefore culverts may be more appropriate for certain locations.</p>

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				NEV development, new cycleways are planned which run both west/east and north/south. Over the edge measures are relevant for the first, but adequate culverting will be required for the second. This reinforces the need to ensure there are clearly defined routes for surface water flow west/east to maximise the utility of any culverts.	
10	5	Table	27	<p>Underpasses <i>'The drainage of any underpasses must be designed to prevent flooding in all rainfall events up to a 1 in 100 plus climate change event (page 27)'.</i></p> <p>As noted in our original response, the definition of underpasses should make specific mention of including highway tunnels under the railway, in particular for critical-use highways, but also for Rights of Way. Within the NEV, critical-use highways are the improved railway tunnel at Carpenters Arms exit onto the A420, and the new road tunnel access to Rowborough which is likely to be in an area currently prone to flooding. In terms of footpaths and cycleways, this will apply to the potential use of existing tunnels under the railway that might be utilised for a Right of Way from Rowborough to the A420.</p>	Agreed, clarify definition within SPD.

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10	6	Table	38	<p>SuDS scheme consultees should include parish councils.</p> <p>The process diagram on page 38 rightly includes those whose responsibility includes regulation, but the 'key consultees' column includes those who may take on responsibility for maintenance etc. We would argue that parish councils should be considered appropriate consultees for SuDS proposals in any case, but particularly as they may be the adopters of green space and community facilities which incorporate essential parts of the SuDS proposals. It is quite evident that, in the particular case of the NEV, the 'Lead Local Flood Authority' has not adequately engaged with the parish council on identifying flood risk despite requested requests since 2014, and this may be why both the initial draft of this SPD and this revision are less than accurate in relation to South Marston.</p>	Noted. The table outlines the key consultees in terms of legislation. It does seek to limit consultation to these parties only and allows for other stakeholders to be consulted where appropriate.
10	7		42	<p>Potential funding options: Paragraph 4.2.1. states that service management companies could take on maintenance arrangements as follows: <i>'Through service charge... Through model agreement and commuted sums paid by the developer to the</i></p>	This seeks to outline the potential options available for the maintenance of SuDS. Ultimately however, the responsibility lies with the land owner and they must ensure that any drainage systems are suitably maintained.

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				<p><i>Maintenance Company. Through Charitable Trusts or Not-for-profit companies which could also serve as Maintenance Companies. By working with SBC, parish councils and Thames Water to set up a 'NEV Green Infrastructure Management Company'. In partnership with SBC and/or parish councils. Securing bonds to adopt and manage infrastructure'.</i></p> <p>We feel this is format is confusing, mixing responsible body and sources of funding for maintenance, without clarifying when and when not the developer should be responsible for providing commuted sums for maintenance. The text that follows the list does not help with this. For instance, can a 'NEV Green Infrastructure Management Company' benefit from commuted sum payments in the same way as a designated 'Maintenance Company'.</p>	
10	8			Great Stall East identifies drainage routes crossing or bounding the A420, but the subsequent text only talks about the visibility of SuDS measures from the A420, not	Noted, some elements have been removed for clarity. The document is not seeking to propose specific solutions, but to highlight the characteristics of each island to inform

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				managing the risk of flooding on the A420 itself apart from that part of the road that lies within the Flood Zone. It should specifically mention the need for keeping the A420 clear of flooding along the full boundary with Great Stall East.	the design and structure of SuDS.
10	9			<p>South Marston: Despite concerns expressed previously to the Flood Authority, the text still does not identify the extent of surface water flow from west to east across the proposed development area north of the A420. The text now makes reference to the Environment Agency surface water flood map, but fails to follow through with the implications of this.</p> <p>As identified in our response at point 2 above, the following statement is incorrect: <i>‘These are mainly through the proposed green corridors between the proposed development parcels and by retaining the existing watercourses and swales in this area as well as introducing new SuDS such as swales and attenuation basins, will maintain and control the flow routes safely through the development to ensure flood risk is not increased elsewhere’</i>. This is because at least two key drainage paths from Thornhill Road to</p>	The maps and text have been updated to reflect revised data.

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				Old Vicarage Lane are missing from the map on page 81. This is of particular importance since these will be affected by housing parcels and road construction. Perhaps the responsible officers will finally engage with the parish council to ensure an appropriate village specific appendix can be prepared?	
11	1			The NEVs will be the largest greenfield development in Europe and will be sited on a floodplain which already has flooding problems, such as on the A420 in 2007. Development will lead to quicker runoff from a large area of housing, even if houses are built on raised islands above the water. Elsewhere, such as at the smaller development in Royal Wootton Bassett, it has been noted that new housing has resulted in increased runoff into the Wilts & Berks Canal, despite attempts to reduce this by using SuDS.	Noted.
11	2			The Wilts & Berks Canal summit section will run across the NEVs area, intercepting water from the south before it reaches most of the NEVs development. It will provide an additional route for water under the railway and will take water away eastwards rather than trying to find its way through the A420 culvert, which is already inadequate.	It must be recognised that the SuDS Vision is not setting new policy, it is providing guidance to developers to ensure surface water drainage strategies / schemes align with current guidance and legislation and provide sustainable drainage to adequately manage surface water across the NEV area.

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11	3			It is astonishing to see a drainage document which claims to show floodwater routes across the line of the canal but does not show the canal at all, the main flood protector.	We acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.
11	4			The Wilts & Berks Canal is a national asset, the largest canal restoration project in the UK, likely to make Swindon the canal hub for Wessex again when completed. Refusing to build this section now, when there are resources available, instead leaving it until later, will be a lose-lose situation with loss of drainage protection, loss of funding for the restoration, loss of amenity at a site which desperately needs it and the disruption of turning this back into a construction site after residents have moved in.	<p>We acknowledge that a canal can provide some of the main principles of an overall SuDS scheme to provide drainage and flood risk benefits and it has been recognised in the SuDS Vision SPD that if delivered as part of the development, the canal can be part of the drainage solution for some areas of the development.</p> <p>Therefore we are happy to consider the canal as part of the drainage solution for a development parcel, where it is being proposed by the applicant however, we cannot specify which drainage solutions are used to meet the requirements of an overall SuDS scheme.</p>
12	1		All	A number of comments relate to the NEV Planning Obligations SPD, the NEV Masterplan, the current drainage situation	The SuDS Vision SPD offers guidance to developers to ensure surface water drainage strategies / schemes align with current

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				within the NEV and the proposed canal.	guidance and legislation and provide sustainable drainage to adequately manage surface water across the NEV area. As a result, some of these comments to directly relate to the content of this SPD.
12	2			Even though the Canal Trust has been granted protective status for their proposed canal route it should not be taken that they are the only people who should be responsible for flood protection for the NEV, SBC are legally responsible for flood protection for the NEV.	NPPF provides policy that developments and planning authorities need to follow to ensure flood risk is not increased by development. SBC as the Lead Local Flood Authority (LLFA) have the jurisdiction to manage surface water and ground water flood risk within the Borough. The Environment Agency have the jurisdiction to manage fluvial flood risk.
12	3			Richard Bennett and Tim Price have both indicated to us that they would like to use the protected route for anti-flooding purposes. However, the Canal Trust detail designs, as shown in their document 'Flood Protection of NEV', which is incorporated into SBC NEV Draft Illustrative Materplan, does not go far enough to help prevent flooding especially around Great Moorleaze Farm.	The draft masterplan shows a safeguarded route for the canal, it does not show the proposed canal. Where the future canal or other strategic infrastructure is proposed in flood zones 2 and 3, proposals must provide compensation for loss of flood plain and demonstrate that flooding will not be increased elsewhere. The works required to address this may provide opportunities for further flood risk benefits and the LPA and developers must use opportunities offered

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					by new development to reduce the causes and impacts of flooding as required by paragraph 100 of the NPPF. The EA will need to be consulted on any proposals.
12	4			<p>Fig 11 (Length 4) shows flood defences coming from Lotmead towards Acorn Bridge. This indicates that there will be a further ditch at the base of the canal allowing any flood water to flow back into the canal at a lower level further along its course.</p> <p>Unfortunately there isn't a lower level for this to occur because the diagram shows that this is the very lowest water level in the canal, therefore it is not possible to allow the flood water to get back up from the ditch into the canal.</p>	These works have been approved by the EA as part of the proposals of a planning application. The canal has not been proposed as part of the development here and although the development safeguarded a route for the future delivery of the canal, these proposals may compromise the delivery of the canal and therefore further information will need to be provided to show the delivery of the canal will not be compromised or the canal needs to be incorporated into the works before planning can be granted.
12	5		74	Concerned that the reference to LiDAR data is not taken account within the document.	This refers to the need for further investigation to be undertaken on a site specific basis. The results of this will be required for each individual planning application.
13	1			1. Play Areas and Sports Pitches should not be allocated within flood zones and used for the purpose of SuDS.	Noted. The precise location of play areas and sports pitches will be controlled through the planning process.

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13	2			2. No SuDS features should become the responsibility of Parish Councils. There needs to be sufficient maintenance provision within the proposed development sites to ensure that all SuDS are maintained properly to prevent future flooding.	The SuDS Vision outlines a number of potential maintenance options, however the responsibility lies with the land owner to ensure one of these methods is adopted.
13	3			3. Wanborough Road regularly floods, who will be responsible for the maintenance of the ditches along Wanborough Road once the NEV is developed?	It is the responsibility of the land owners on adjacent land to ensure they are maintained properly.
13	4			4. Point 2.5.7 Redlands – the description states that it is a “Rural Hamlet” however the proposed site of 300 houses is not a “hamlet” it is part of the urban development.	Agreed. Document amended.
14	1			The Canal Partnership is not making a detailed response but supports the technical response being submitted separately by the Wilts & Berks Canal Trust Some of the key points in this response are: • That the proposed SUDS policy relies on a site by site approach when a holistic view of all of the NEV should be taken into account	Noted. A separate response is being prepared on the Technical document submitted by the Wilts & Berks Canal Trust.
14	2			• The clay soils of the area will limit the effectiveness of attenuation ponds channels and watercourses which may already be at capacity from other sites	Noted. A separate response is being prepared on the Technical document submitted by the Wilts & Berks Canal Trust.

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14	3			<ul style="list-style-type: none"> The site by site approach assumes free and clear drainage 	Noted. A separate response is being prepared on the Technical document submitted by the Wilts & Berks Canal Trust.
14	4			<ul style="list-style-type: none"> Experience would suggest long-term maintenance of SUDS systems and ponds is rarely addressed by developers 	The document seeks to outline the potential maintenance options available, to ensure they are considered at the outset.
14	5			As with the previous submission the Canal Partnership seek to persuade Swindon BC to liaise with the Environment Agency to commission a hydrological study to examine the potential of the constructed canal to protect the area of the NEV from flooding.	Noted. A separate response is being prepared on the Technical document submitted by the Wilts & Berks Canal Trust.
14	6			The report refers to the Wilts & Dorset Canal Trust- this needs to be corrected please	Noted. Will amend.
15	1			<p>We are disappointed that the role of trees and woodland in water management is not referred to in this document, for instance in section 2.4 'Key principles of the SuDS vision'.</p> <p>The wide range of benefits provided by trees and woodland is set out in both the Green Infrastructure Strategy for Swindon 2010-2026 (page 55) and the Swindon Local Plan (Policy EN1).</p> <p>The Woodland Trust believes that trees and woodlands can deliver a major contribution to</p>	Noted. Trees and woodlands can play an important role within SuDS and can bring additional benefits. Reference added to SPD.

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				<p>resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - https://www.woodlandtrust.org.uk/mediafile/100263208/rr-wt-71014-woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf?cb=001108c3a78944299140a996b2cd7ee8.</p> <p>As such, incorporation of appropriate tree planting into SuDS design can benefit not just water management but wildlife, amenity and health as well.</p> <p>In order to conform with national and local planning policy, we would therefore like to see this SPD incorporate a specific section supporting the role of woods and trees in SuDS design.</p>	

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16	1			We support the aims of the draft SPD and the use of Sustainable Drainage Systems in the NEV development area. We would however comment that all planning applications should be considered on their own merits.	Noted and agreed. The SPD seeks to provide guidance to developers to inform specific design on a site by site basis.

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