Wiltshire Council Planning Consultation Response

2 October 2023

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Jane Fuller
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Application No: **PL/2023/07216**
Outline planning permission: Some matters reserved
Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 205 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structure
Land at Penn Hill, Calne, Wiltshire, SN11 8RR

Please note the particulars in connection with the above planning application are available to view on the planning website http://www.wiltshire.gov.uk/planninganddevelopment.htm

Recommendations:

	No Comment
	Support
X	Support subject to conditions (please set out below)
	Object (for reasons set out below)
	No objections

Matters Considered:
Documents Reviewed:

- Flood Risk Assessment & Drainage Strategy.pdf
- Site Location plan.pdf

The application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

Conditions:
It is understood that this proposal identifies the principal components of the surface water strategy and is subject to further detailed localised investigations as part of the subsequent Reserved Matters applications. These assumptions are subject to evolution as the design develops and the individual parcels are further realised. The LLFA therefore has no objection subject to the following conditions which need to be addressed by the applicant as part of the full submission:

1. Prior to commencement of construction, the applicant shall provide the full detailed surface water drainage strategy to the LLFA for approval.
   The full surface water drainage strategy must include:

a) Detailed drainage plans and calculations:

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- A plan showing the cross sections and design of any attenuation pond and its components.
- A manhole / inspection chamber schedule to include cover and invert levels.
- the 1 in 30 year + climate change rainfall is contained within the drainage system without causing flooding to any part of the site.
- Hydraulic model outputs to demonstrate that the 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
- Plans to demonstrate that the site has been designed to ensure that flows in excess of the 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.

b) No development shall commence on site until the applicant has undertaken a sensitivity analysis on the network considering surcharged outfall conditions.

REASON: To ensure that any flooding resulting from a surcharged outfall will not affect people or property.

c) Section 7.35 states that discharge rates shall be limited to the Qbar event (1 in 2.33yr return period) for all storms up to and including the 1 in 100yr + climate change event. Although this will comply with the betterment policy for the majority of storm events, the applicant must demonstrate that for the 1in 1 year event, discharge rates are restricted to 80% of 1 in 1 year greenfield rates. No development shall commence on site until the applicant has provided calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events.

REASON: Wiltshire Council requires post development discharges to provide 20% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards

d) As stated in Section 7.58, before the design phase is concluded, the proposals are reviewed and analysed in order to identify potential shortcomings and to ensure that adequate volume of SuDS features are provided to mitigate the risk of pollution from each source. Therefore, no development shall commence on site until the applicant has submitted calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment.

REASON: to prevent pollution of the receiving watercourse

e) The FRA refers to the proposed adoption and ownership of the drainage (Section 7.67) however no development shall commence on site until the adoption and ownership has been confirmed.

REASON: To ensure that the SW drainage performs as designed and to avoid flooding due to lack of maintenance.

f) No development shall commence on site until a construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

REASON: There's a statutory duty to ensure that surface water quality and quantity is managed throughout construction and as not to increase flood risk, or pollution of watercourses.

Informatives

- The applicant should note that in all instances the preference should be to utilise blue-green SuDS which provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity); for example, for attenuation features preference should be given to use of swales / ponds / detention basins (if technically feasible) instead of attenuation tanks. The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features should be provided at an early stage in order to fulfil the requirements of NPPF Paragraph 169; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost. We currently note that the applicant relies heavily on end-of-pipe large attenuation features; as part of the detailed drainage strategy we will expect to see greater utilisation of SuDS as source controls, and to provide flow conveyance around the site as well.

- The applicant is referred to the EA's consultation response regarding contaminated land; the contaminated land risk will need to be considered as part of the development of the detailed drainage design so that additional pollution pathways are not created.

- Within the calculations, the MADD factor must be set to zero and the margin for "flood risk" warning in hydraulic models been set to >= 300mm.

- If a value other than 0m3/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.

- WC issues land drainage consents for discharges to ordinary watercourses and for any works within 8m of one

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James Playfair (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.