

Wiltshire Council Planning Consultation Response

3rd October 2023

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: David Cox
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Application No: 20 03641 OUT
Outline application for up to 91 dwellings, landscaping, green infrastructure, associated drainage measures and vehicular access from the A363 as well as all associated works
Land South of White Horse Business Park, Trowbridge, Wiltshire

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
☐	Support subject to conditions (please set out below)
☒	Object (for reasons set out below)
☐	No objections

Matters Considered:

Documents Reviewed:

- Flood Risk Assessment and Drainage Strategy
- Illustrative Sketch Layout
- Masterplan Document
- Turley Letter explaining the revised proposal and plans

"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."

It is noted that the developable area within the application site has been reduced. A portion of land that was previously proposed to be developed will now be replaced with green infrastructure, reducing the overall impermeable area post-development.

The applicant has stated that there is further opportunity for source control measures in the form of permeable paving and road side swales. No further information has been provided on these in the FRA or drainage strategy, but we support such measures being included.

Objections:

The drainage team in their capacity as Lead Local Flood Authority have the below objections to the application; these must be overcome before a drainage objection can be removed:

It is noted that Watermans have carried out hydraulic modelling for the site to show more accurate surface water flood extents. However, given the prevalence of surface water flood risk around the existing ditches on the site, the applicant should carry out a wider hydraulic assessment to inform the following:

- Whether the existing ditch and culvert have sufficient capacity to take existing flows and flows from the development
- How surface water flows from the development could affect flood extents

The applicant should also determine modelled flood levels for the site to demonstrate the following:

- Any crossings over existing ditches can be set above the 1 in 100 year + climate change flood level.
- Any access roads that are predicted to flood can be set above the 1 in 100 year + climate change flood level.
- There is no possibility of surface water flows entering the attenuation basins.

The applicant states that discharge rates from the site will provide 20% betterment on Qbar. This does not satisfy Wiltshire Council's betterment policy. The applicant should provide calculations that demonstrate that the required betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and 1 in 100 year return period storm events.

Conditions:

Following the removal of the drainage objection, the drainage team have the following conditions which need to be addressed by the applicant:

The site sits wholly within Flood Zone 1, however parts of the site (that coincide with an open ditch and topographical low points) are subject to surface water flood risk. It is noted that Waterman's flood mapping shows some additional areas of surface water flood risk within the housing development, and that there is a topographical low point (44.10m) at the centre of the housing development where there could be a risk of pooling. The applicant should demonstrate that:

- These areas can be drained by the drainage network in the 1 in 30 year rainfall event with no flooding on site.
- There are mitigation measures in place to reduce the risk of flooding to any property in the 1 in 100 year + climate change event. Mitigation measures should include ensuring that finished floor levels are at minimum 150mm above the 1 in 100 year + climate change flood level.

The FRA states that ground water was encountered at 1.5m bgl at a nearby site. There is no evidence of any ground water monitoring for the applicant's site. The applicant will need to provide evidence of groundwater monitoring that accounts for seasonal variation to determine the highest groundwater level. The applicant must consider whether groundwater could interact with the proposed attenuation basins. If there is any potential for this, the applicant should provide flotation calculations and consider lining the attenuation basin.

No development shall commence on site until clear arrangements are in place for ownership and ongoing maintenance of SuDS over the lifetime of the development.

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.

The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council.

Informatives:

WC issues land drainage consents for discharges to ordinary watercourses and also for any works within 8m.

(Atkins working on behalf of Wiltshire Council Drainage).