Wiltshire Council Planning Consultation Response

09 November 2023

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Application No: **PL/2023/08810**

FULL PLANNING APPLICATION FOR THE "ERECTION OF GRAIN STORE, INPUTS BUILDING, ACCESS TRACK, HARD STANDING AND ASSOCIATED WORKS."

WOOLLEY PARK FARM, BRADFORD ON AVON, WILTS, BA15 1TU

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:

- *Application Form*
- *Design and Access Statement*
- *Flood Risk and Drainage Statement*
- *Grain Store Elevations*
- *Grain Store Floor Plan*
- *Inputs Store Plan and Elevations*
- *Location Plan*
- *Site Layout Plan*

The application is a full application and is supported by 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.

National planning policy requires SuDS to provide multifunctional benefits, where possible. There are four main categories of benefits that can be achieved by SuDS: water quantity, water quality, amenity and biodiversity. These are referred to as the four pillars of SuDS design.

The current proposal only provides two of the four main categories – water quantity and quality. The applicant must also consider amenity and biodiversity benefits, in line with Core Policies 52: Green Infrastructure and Core Policy 67: Flood Risk.

The comments from the Council's Drainage team address only water quantity and quality benefits. The Council's Landscape and Design team must be consulted to comment on amenity and biodiversity benefits, to ensure high quality SuDS that provide multifunctional benefits.

Conditions:
The drainage team have the following conditions which need to be addressed by the applicant in order to approve the proposal:

1. **No development shall take place until surface water drainage works have been implemented in accordance with Non-Statutory Technical Standards for Sustainable Drainage Systems or any subsequent replacements national standards and details that have been submitted to and approved in writing by the Local Planning Authority.**

   In order to discharge the above drainage condition the following additional information must be provided:

   - The applicant plans to restrict discharge rates from the site to the greenfield Qbar rate for all events up to the 1 in 100 year + climate change storm; it is acknowledged that for the higher return period rainfall events this will provide betterment, however this will not provide the required level of betterment for lower return period events (such as the 1 in 1 year rainfall event), in line with Wiltshire Council's betterment policy for greenfield sites;

     "With regards the control of surface water discharges from greenfield sites, 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."

     The applicant must provide 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 100 year return period storm events.

   - The applicant is proposing to discharge into an existing drainage ditch. Evidence should be provided to demonstrate that this drainage ditch has capacity to manage existing flows and flows from the proposed development, and that the capacity of any downstream network/infrastructure is fully understood.

   - Calculations that demonstrate the following:
     - The 1 in 30 year rainfall event is contained within the drainage system without causing flooding to any part of the site.
     - The 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
     - SuDS features have been sized appropriately.
     - The drainage system provides a sufficient level of water treatment to prevent pollution of the receiving watercourse.

   - A clearly labelled drainage layout plan showing the pipe networks and any SuDS features. The plan should show any pipe/node numbers referred to within the drainage calculations.

   - Detailed drawings, including cross sections, for all SuDS features.

   - An exceedance routing plan that demonstrates 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.

- Should the applicant propose to use any infiltration as part of the drainage strategy, the applicant should produce a contamination risk assessment that demonstrates contamination risk can be appropriately managed, given the site's proximity to SPZII.

- 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.

2. **No development shall take place until a site-specific groundwater flood risk assessment has been carried out in accordance with Wiltshire Council's Groundwater Management Strategy, and evidence has been provided to demonstrate that any groundwater flood risk has been managed and mitigated through the drainage design which has been submitted to and approved by the local planning authority.**

   In order to discharge the above drainage condition the following additional information must be provided:

   - Groundwater level monitoring (taking into account seasonal variations).
   - The interaction between different sources of flooding.
   - How groundwater will impact on the proposed drainage system.
   - The interaction between groundwater, groundwater recharge and aquifers.

3. **No development hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details.**

   In order to discharge the above drainage condition the following additional information must be provided:

   - Management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.
   - Verification report providing photographic evidence of construction as per design drawings;
   - As built construction drawings if different from design construction drawings;

Informatives:

The surface water drainage strategy should include/demonstrate the following:

- Existing greenfield runoff rates for the site.
- Post development runoff rates in accordance with Wiltshire Council's betterment policy update, which can be found here.
- A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented.
- A detailed topographical survey that clearly identifies the existing drainage features on the site as well as level contours to show overland flow routes.
- If infiltration is proposed, soakage tests in accordance with BRE 365 to demonstrate that infiltration is feasible.
- Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property;
- SuDS source control measures to manage water quantity and maintain water quality have been implemented wherever possible and throughout the management train so the development is not reliant upon large attenuation features close to the points of discharge.
- SuDS have been selected to provide a wide range of benefits including amenity, biodiversity and maintaining water quality.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Surface water can be safely managed within the proposed development, up to and including a 1 in 100 year plus climate change event.
- Exceedance routes that minimise the risks to people and property.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.

Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows

Wiltshire Council's land drainage bylaws can be downloaded here. The land drainage consent application form and guidance notes can be found on our website here.

Pre-app	Outline	Full	Reserved matters	Discharge of conditions	Document to be submitted
✓	✓	✓			Flood Risk Assessment / Statement
✓	✓	✓			Drainage Strategy / Statement & sketch layout plan
	✓				Preliminary layout drawings
	✓				Preliminary “Outline” hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of third party agreement for discharge to their system (in principle/ consent to discharge)
		✓		✓	Maintenance program and on-going maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full Structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration results
		✓	✓	✓	Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters
		✓	✓	✓	Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change
		✓	✓	✓	Detailed landscaping details
		✓	✓	✓	Discharge agreements (temporary and permanent)
		✓	✓	✓	Development Management & Construction Phasing Plan

Vijit Rathore (Atkins working on behalf of Wiltshire Council Drainage).

Wiltshire Council