Wiltshire Council Planning Consultation Response

1 February 2024

Officer's Name: Russell Brown

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Application No: **PL 2023 10641**

Emmaus School, School Lane, Staverton, Trowbridge, BA14 6NZ

Demolition of existing modular classroom and rear extension to main school building; erection of two storey building on existing playground; erection of single storey rear extension; with associated landscaping and highways works

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)
X	Object (for reasons set out below)
	No objections

Matters Considered:
Documents Reviewed:

- Application Form
- Plan showing site in context of wider area

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.

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:

No drainage strategy has been submitted, therefore the LLFA cannot comment on any proposals at this stage.

Any proposals should be designed in accordance with the Non-statutory Technical Standards for Sustainable Drainage Systems and the latest SuDS Manual (C753).

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

- Existing 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.
- Calculations to demonstrate the attenuation requirements for the 1 in 100 year plus climate change event to support the proposed strategy.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Evidence that the impact upon existing drainage systems is mitigated by discharging the flow throughout the management train rather than relying upon a single point of discharge.
- 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.
- All proposed drainage features are outside flood zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.
- 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.

Megan Macpherson (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.