Wiltshire Council Planning Consultation Response

20/02/2024

Officer's Name: Callan Powers

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Application No: **PL/2024/02992**
Erection of 14 Holiday let lodges and associated works
Land South of Headlands Farm, Cricklade, Wiltshire, SN6 6HZ

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
- Argyll – Statement
- Contaminated Land Report
- Environmental Management Report (Including Waste and Ecology)
- Flood Risk Assessment
- Location and Block Plans
- Planning Statementt
- Proposed Holiday Lodges - Elevations and Floor Plans
- Smallscale Location Plan
- Transport Management Report
- Waste Management Report

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.

Objection:
The LLFA **Object** to the current application on the grounds of insufficient evidence being provided. We cannot condition the provision of a drainage strategy, as no information has been provided to demonstrate that the site can be safely drained.

No surface water drainage strategy has been submitted, for this full, major planning application (1.011ha), to demonstrate how surface water will be safely managed. The applicant should provide a detailed drainage strategy based on the information provided within the informative section below.

No foul water drainage strategy has been submitted to demonstrate how foul water will be safely managed on site.

Informatives:

Surface Water Drainage Strategies

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.

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

The applicant should note the EA's updated climate change guidance (dated 27 May 2022) when preparing the Drainage Strategy.

The developer should provide the following information as part of future planning applications:

- Evidence that SuDS have been selected, wherever possible, to provide a wide range of benefits including amenity, biodiversity and maintaining water quality.
- Evidence that 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.
- Existing greenfield runoff rates for the site.
- Post development runoff rates in accordance with Wiltshire Council's betterment policy:
    - *With regards the control of surface water discharges from new development, Wiltshire Council requires post development discharges from greenfield sites to provide 20% betterment over pre-development discharges for all storm events between the 1 in 1year and 1 in 100year return period events.*
    - *For greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.*
- Evidence demonstrating how the surface water disposal hierarchy has been applied and how all other options have been exhausted. The hierarchy is set out below (as per the Sewerage Sector Guidance, paragraph C.3.12):
    - Surface water runoff is collected for use.
    - Discharge into the ground via infiltration.
    - Discharge to a watercourse or other surface water body.
    - Discharge to surface water sewer or other drainage system, discharging to a watercourse or other surface water body.
    - Discharge to a combined sewer.
- The drainage strategy does not increase flood risk, as a result of catchment transfer.
- A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented.
- 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.
- 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.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Measures to prevent pollution of the receiving groundwater and/or surface waters.
- 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.

Ground Investigations

- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
- Groundwater level monitoring (taking into account seasonal variations).
- The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.

Detailed Drainage calculations

- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Hydraulic Models should set the MADD factor / additional storage volume factor to $0m^3$ / ha in order to prevent an overestimation of storage capacity in the proposed drainage network.

Design Drawings

- A plan showing the cross sections and design of any attenuation pond and its components.
- 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.

Third party consent

- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Ownership and Management

- 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.

Construction

- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- A construction management plan.

Foul Drainage

The applicant should note that in all instances, the preference of the EA and the LLFA is for foul discharge to be to the foul / combined sewerage network (subject to agreement from the Sewerage Undertaker for the area.)

Septic Tank / Private Treatment Plant.
Where applicants intend to discharge foul water via a Private Treatment Plant / Septic Tank, the applicant will need to demonstrate compliance with the General Binding Rules (General binding rules for small sewage discharges (SSDs) with effect from January 2015 (publishing.service.gov.uk)). As part of the foul strategy the applicant would need to:

- Submit evidence to the LPA to support that the General Binding Rules have been met
- Include any foul discharges to surface water bodies as part of the Land Drainage (Ordinary Watercourses) Application / EA Environmental Permit (Main Rivers) Application

Where proposals do not meet the General Binding Rules, Environmental Permit applications for foul discharge must be made to the Environment Agency.
Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK (www.gov.uk)

Land Drainage Consent

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.

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Jed Ainsley-Bridger - (AtkinsRéalis working on behalf of Wiltshire Council Drainage).