



RCC TOWN PLANNING CONSULTANCY

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Dear Sir/ Madam,

RE: DISCHARGE OF CONDITIONS 4, 5, 7 AND 8 RELATING TO ORIGINAL PLANNING PERMISSION PL/2023/09594.

AT: CHESTNUT FARM, CHURCH LANE, DAUNTSEY, CHIPPENHAM

Please find enclosed the landscaping scheme and LIMP (incorporating the Biodiversity Mitigation and Enhancement Plan requirements) and details of bollard lighting to formally discharge condition numbers 4 & 5 of the above consent. In relation to condition number 4, elevations of Buildings A, B and C have been provided with the marked up with locations for each integrated bat box (x1 per building) and integrated swift boxes (x 2 per building).

To confirm, these will be specified as per set out in Section 5.2 of the Ecology Report by Malford Consulting submitted with the original planning application, which includes (Vivara Pro swift nest chamber and entrance brick unless timber clad when a hole can be cut into timber to allow access to nest chamber and then brick not needed) and at Section 5.3 (Habibat unclad box [middle picture] which will then be clad as per approved finish.

Regarding condition number 7, we note that the planning officer in the case officer report did not choose to impose the full conditions recommended by the drainage team as the existence of the prior approval scheme with less onerous stipulations was considered a valid fallback position, and so he imposed the planning condition as follows:

'7. The development shall not be first occupied until details of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. The details shall include an operation and maintenance plan confirming who is responsible for maintenance and a timetable for ongoing maintenance.'

REASON: To ensure ongoing compliance with the sustainable drainage recommendations of the Flood Risk Assessment hereby approved.'

In terms of interpretation of this condition, the reason for the condition is critical and this is further supplemented by the explanation provided in the Case Officer Report. In this instance, the condition is not in fact, seeking wholly new SUDS details as these formed part of the approved FRA which were accepted by the Council's Drainage Team. Instead, our



understanding is that the officer believed the operation and maintenance plan confirming who is responsible and a timetable for ongoing maintenance still needed to be provided, to ensure ongoing compliance with the FRA. This is all as confirmed by the Case Officer Report where the relevant excerpt states:

Drainage

The application has been supported, as with the previous applications at the site, with a Flood Risk Assessment that includes a drainage strategy intended to ensure that the development adequately mitigates the risk of flooding. This is necessary as part of the site falls within Flood Zone 2, where there is a heightened risk of flooding from fluvial sources.

The Flood Risk Assessment has been accepted by the Council's Drainage Consultants, who have indicated that the strategy is acceptable, subject to conditions, and suggest some conditions to be attached to any planning permission issued. Pre-commencement conditions suggested in respect of groundwater and drainage calculations are not considered to meet the relevant tests for planning conditions, in particular given the fallback position it would not be reasonable to impose onerous additional conditions without any reasoning given.

It is however considered necessary to impose pre-occupation conditions in respect of an emergency plan and an operation and maintenance plan for sustainable drainage. These will ensure that consideration is made as to how the recommendations of the Flood Risk Assessment are upheld in the long term.

However, the approved FRA submitted with the application did include the additional information sought by the planner so we assume this was likely an oversight. The FRA states as follows:

Adoption and Maintenance

3.23 The proposed cellular attenuation tank and associated drainage network will be maintained by the site owner or a private maintenance company acting on the owner's behalf. A draft maintenance schedule is outlined below (and it proposed to implement this schedule accordingly).

Cellular Attenuation Tank

3.24 It is not envisaged that silt build up within the cellular crate systems will require a rigorous maintenance regime so long as silt is removed from upstream catch pits and inspection chambers on a regular basis. Notwithstanding this, a suitable maintenance regime for the systems will comprise of routine inspection and silt removal (as necessary). Inspection should be undertaken using CCTV equipment offered up the inspection tunnels located within the crate system. Camera access can be gained via inspection chambers and inlet pipework located at each end of the tunnels.

3.25 Silt removal can be achieved by jetting the inspection tunnels. Jetting should be undertaken in accordance with current jetting guidelines, in particular the Code of Practice for Sewer Jetting published by The Water Research Centre. Jetting at 150bar at 300l/min should be more than adequate in removing any build-up of material within the tunnel. The crate system will take higher pressures. However, unlike regular jetting which relies heavily on high pressure to



remove hardened deposits on the inner bore of pipes, effective cleansing of a crate system relies more on the delivery flow rate to flush solids back through the system.

3.26 A standard jet head with rear facing nozzles should be used. The head should be fed to the far end of the crate tunnel via the nearest inspection chamber, activated and retracted. As the

nozzle is removed, debris will be swept back into the inspection chamber where it can then be removed with the use of a standard gully sucker. This method will ensure the effective removal of gross solids (carrier bags, cans, leaf litter etc.) from the system. Whilst 100% removal cannot be guaranteed, it has been shown that this jetting method will also remove an element of finer material which would otherwise be 'lost' within the system.

Pipework and catchpits

3.27 It is not envisaged that silt build up within the pipework systems will require a rigorous maintenance regime so long as silt is removed from upstream catch pits on a regular basis. Notwithstanding this, a suitable maintenance regime for the systems will comprise of routine inspection (every six months) and silt removal (as necessary).

Flow Control

3.28 The flow control should be inspected regularly for blockages and silt/ debris removed as necessary.

Consequently, we trust these details are sufficient to formally discharge condition number 7 of the above consent.

As regards condition number 8, a separate Flood Emergency Plan is supplied as part of this discharge of condition application.

We trust this is all that is required to formally discharge all relevant planning conditions, however please do get in touch if we can be of further help.

Yours sincerely

Rachel Steer Bsc (Hons) MA TCP
Associate - RCC Town Planning Consultancy