

Wiltshire Council Planning Consultation Response

25 October 2018

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Paul Galpin
Officer's Title: Senior Planning Officer
Direct Line: 01249 706657

Application No: 18/09884/OUT
Residential development for up to 95 dwellings including roads, footpaths, balancing areas and open space.
Land South of Westwells road, between Rowan Lane & Jaggards Lane, Neston , Corsham
Eastings: 385355 Northings: 168862
Mr Mervyn Dobson

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>

I would welcome any comments that you have about this particular application by **29 November 2018**. If I do not receive your observations and comments by this date I will assume you have none. If you require an extension of time please contact the Planning Officer above who will do their best to accommodate this.

Recommendations:

<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input type="checkbox"/>	Support subject to conditions (please set out below)
<input checked="" type="checkbox"/>	Object (holding pending clarification of certain points below)
<input type="checkbox"/>	No objections

Matters Considered:

We have commented on a preapp for this site (for 110 dwellings) with the following comments:

- No drainage proposals have been submitted, therefore we cannot comment on any specific proposal at this stage. However, please note, as this is for 10 or more dwellings, this would constitute a major development under government guidelines, therefore any application would need to provide the information contained in the attached briefing note. Please provide this to the applicant.
- Also, due to the size of the site, they will need to do a full Flood Risk Assessment (FRA) with any submission, which should cover all the items in the attached briefing note.
- There are a few factors that will impact on the viability of any infiltration based SuDS at this site:
 - This site is located in an area vulnerable to groundwater flooding, therefore the permeability of the soil would need to be confirmed by site investigation. Nearby schemes have struggled to prove that infiltration based SuDS can work in this area. However should permeability testing show that infiltration may be possible, they also need to undertake surveys to determine an agreed top groundwater level taking into account seasonal variations. Thus this may require monitoring for 12 months or more. Any soakaway MUST have at least 1m of unsaturated soil between its base and the agreed top groundwater level. This may have an impact on site layout.
 - It is noted that there is an air shaft on site and underground chambers (mines) still in use, therefore the use of infiltration is likely to affect this underground area. It is advised that the applicant investigates this further.

- The application mentions 'contamination from previous uses'. If contamination is present, infiltration techniques is highly likely not be appropriate.
- The site is located within a water supply source protection zone (2 outer protection zone). We would need to consult Wessex Water and the EA on any proposal.
- The site is also located in an area known to flood as a result of surface water in the 1 in 30/100 events. Flood maps attached. We note from the illustrative masterplan that they are proposing a pond/attenuation in the area indicated as having surface water flood risk. Any sizing of this pond will have to take into account the current volume of surface water flooding, and not only sized to serve the proposed development.
- There is currently no known drainage outfall from the site and the connection into existing infrastructure would have to be confirmed by survey.
- We have attached an extract of the Wessex Water sewer maps, but we advise that they contact Wessex Water for more information as:
 - a foul sewer crosses the site
 - capacity to serve would need to be confirmed
 - surface water sewer capacity may be available for site drainage.

In conclusion, surface water drainage will prove challenging at this site and will need full investigation, with results included in any application (FRA).

Mapping indicates that surface water flood risk exists in the north east corner of the site for 1 in 30/100 events – this is an issue which needs to be resolved – as is the existing housing development to the north of Westwells

The area is Westwells and Spring Lane thus suggestive of surface water issues

WW records show a foul sewer crossing the site – as with preapp discussion needed with WW over potential connections and capacity to serve the application development – Submission indicates talks are on going

WW also appear to indicate the existence of some private storm water systems to the north of the site then crossing road and going into rear gardens – as preapp there are issues regarding storm water drainage disposal in the area – However WC have tried to verify this but could not due to various reasons in an attempt to resolve drainage issues

The application has been supported with a site Specific 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. The developer, or agents working on his behalf, retain the responsibility for the checking of the design, calculations and details contained in the FRA and additional submitted information.

FRA comments on SI works undertaken in 2008/9 down to 3m did not find any ground water – this need to be repeated to see current state of ground water levels

Soakaway tests were undertaken in early 2018 and rates given in FRA (FRA concludes that due to poor rates and variable across the site that only some infiltration may be possible) – some concern about soakaway use as it is known that the underground working in the area are occupied and that they have to use pumps to keep the workings dry

FRA states part H of building regs as requiring base of soakaway not to touch ground water - LLFA and National drainage guidance is that there MUST be at least 1m of unsaturated soil between the base of any soakaway and the agreed top level of ground water taking into account seasonal variations – note that 2018 has been a relatively “dry” year so ground water level will be low

FRA indicates site is in a source protection zone

FRA says EA has no record of flooding in area in 2014, the LLFA has numerous flood reports for 2014/2015/2016 for the area immediately to the north of this site so any flows from site will be an issue to those properties

FRA states site is brownfield and gives existing runoff rates based on 2 different calculation methods (giving 2 different sets of flows) calculations – plan needed to demonstrate where these existing flows go

Discharge to a water course has been discounted in FRA

Discharge to sewer has been proposed (appears that an old connection has been located from the site) – as above this PRIVATE (?) sewer crosses the road and into known flooding area of properties – right of continued connection – needs to be proven along with proof of current positive flows and not just flows based on calculations – actual figures are needed – only foundations on site so is there currently a discharge from the site to the discovered pipe?

It is noted that there is a proposal to limit post development flows to 5 l/s for all events up to 1 in 100 plus climate change

Storage volume in FRA - where will exceedance flows go?

FRA suggests that temporary drainage arrangements during construction – these will need to be detailed and if planning approval is eventually given will need to be conditioned

FRA suggests SuDs system likely to be operated by Management Company – note needed that the SFA 8th edition, available now, and due to be fully live in early part of 2019 allows WaSC to adopt SuDs arrangements

Conditions:

Currently no conditions due to holding objection seeking clarification and additional information – which if supplied may allow a change in recommendation to support with conditions

Informatives:

Peter Weston, Land Drainage Engineer, Wiltshire Council