

Consultee Comment for planning application P/OUT/2023/01166

Application Number	<input type="text" value="P/OUT/2023/01166"/>
Location	<input type="text" value="Land To The South Of Ringwood Road Alderholt"/>
Proposal	<input type="text" value="Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health faculties; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road)"/>
Case Officer	<input type="text" value="Ursula Fay"/>
Organisation	<input type="text" value="DC - Flood Risk Management"/>
Name	<input type="text" value="Flood Risk Manager"/>
Address	<input type="text" value="Internal"/>
Type of Comment	<input type="text" value="Comment"/>
Type	<input type="text" value=""/>
Comments	<input type="text" value="see attached"/>
Received Date	<input type="text" value="05/04/2023 14:09:44"/>
Attachments	The following files have been uploaded: P_OUT_2023_01166 _ PLN23_020 (1).pdf



Dorset Council, Flood Risk Management Team
Place Services, County Hall, Dorchester

LLFAPlanning@dorsetcouncil.gov.uk

Lead FRM Officer: Alister Trendell
Direct Dial: 01305 221836

Date: 5 April 2023

Internal LLFA Consultation – Surface Water (SW) Management

Our Ref: PLN23-020/2

Proposal: Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road)

Your Ref: P/OUT/2023/01166

Location: Land To The South Of Ringwood Road Alderholt

Grid Ref: 411942, 111800

To: Ursula Fay

We write in response to the above consultation, sent to us as relevant Lead Local Flood Authority (LLFA), and statutory consultee for Surface Water (SW) management in respect of major development (as defined within Article 2(1) of the Town & Country Planning, Development Management Procedure, England Order 2015) and legislated for under The Town and Country Planning (Development Management Procedure) (England) Order 2015, schedule 4, paragraph (ze). Given that the proposal under consideration relates to development of 10 or more residences, we acknowledge that it qualifies as major development.

I can provide the following comments:

The following relevant documents have been submitted in support of this application:

- Report: Flood Risk Assessment, by Campbell Reith, Ref 13577, Rev P2 and dated 05/01/23.

Flood Risk to the site

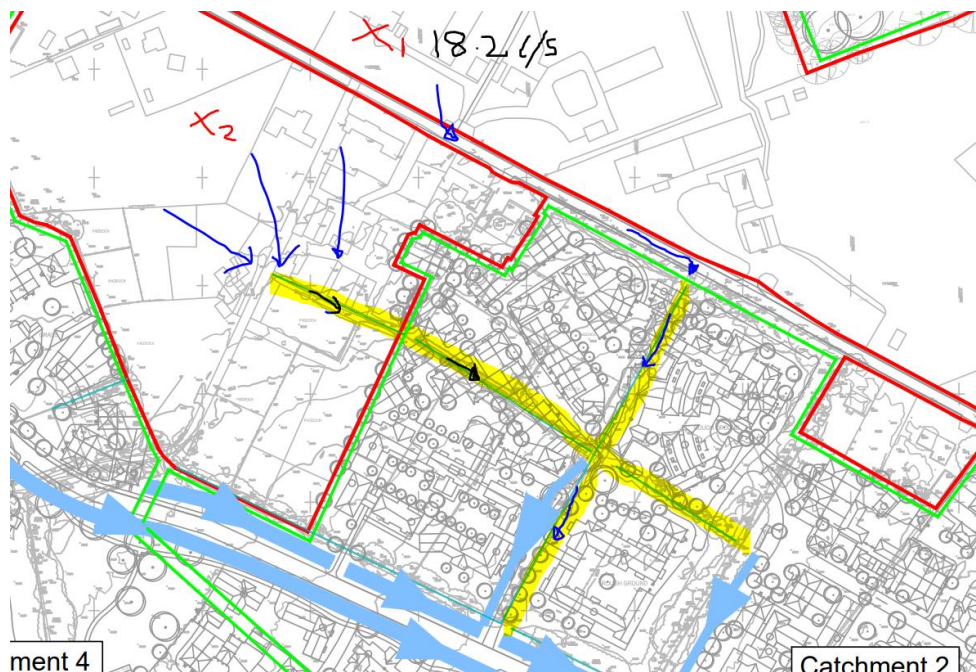
- The Environment Agency's (EA) Flood Map for Planning indicates that the site is within Flood Zone 1 (less than a 1 in 1000 chance of flooding in each year).
- The EA's Risk of Flooding from Surface Water (RoFSW) mapping indicates that areas proposed for buildings do not encroach within the mapped extents.
- There are a number of other drainage lines that traverse the site. The RoFSW does not appear to show flood extents along these drainage lines. I anticipate that this is because the drainage lines were not detected within the model. The lack of

modelled/mapped flood extents does not infer that there is no surface water flow or flooding along these drainage lines.

There are a number of areas of the proposed development where there is a flood risk from an upstream catchment, and where the applicant has not assessed the flood risk – refer below:

1. The figure below is an extract from the applicant's Flood Risk Assessment. An approved development (3/16/1446/OUT) in the uppermost part of 'Catchment 2' marked as X1, has an attenuated discharge of 18.2ls into an existing ditch (approximate location of discharge shown on figure). There is another upstream catchment marked as X2. Both of these catchments discharge through the site along open drainage lines - marked in yellow highlights. The applicant's drainage strategy does not consider these drainage lines. The future layout is shown to be located over these drainage lines with houses shown to be built over the drainage lines. Open drainage lines should be left as open drainage lines where possible. Culverting of watercourses is not permitted, and culverting of drainage lines is discouraged; where a drainage line has to be culverted for any length then an overland flow route will be required. There is an increased flood risk to the proposed development and upstream third-party property because these drainage lines have not been continued through the development; no alternative channel has been proposed. No assessment of the impact of removing these drainage lines has been included in the Flood Risk Assessment.

Insufficient assessment of the flood risk from the upstream catchment, and how this will be managed, has been undertaken as part of the Flood Risk Assessment.

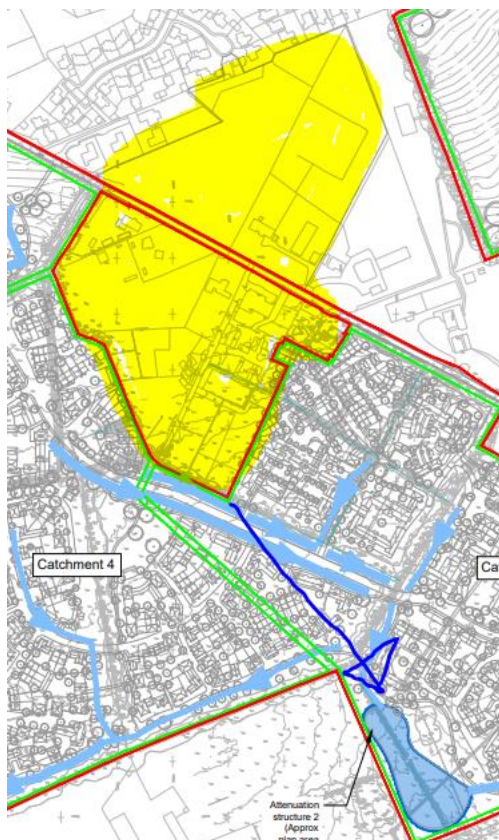


Regardless of prevailing risk, any development has the potential to exacerbate or create flood risk, if runoff is not appropriately considered and managed as evidenced by a substantiated SW strategy. Ordinarily therefore, and in keeping with the requirements of the National Planning Policy Framework (NPPF), all major development proposals must take due

consideration of SW water management and should offer a drainage strategy that does not create or exacerbate off site worsening and should mitigate flood risk to the site.

Surface Water Drainage Strategy

2. The QBAR rate in l/s/ha has not been provided. The QBAR rate for a particular catchment has been provided, but it is not clear what the catchment area is, i.e. total area, developed area or impermeable area. If it is the developed area, then the QBAR Rate ranges from approximately 8.2 – 11l/s/ha; this is about twice what we would expect in this area. This has the potential to underestimate the storage volume required for attenuation and potentially increase flood risk to downstream areas.
3. A 40% climate change allowance has been used in calculations to size the attention basin storage requirement. The current rainfall uplift allowance for Dorset is 45%. The adopted climate change uplift of 40% has the potential to underestimate the storage area required for attenuation. If the attenuation storage is undersized then there may be an increase in flood risk on downstream land (some of which may be third party land).
4. Attenuation Basin 2 will also receive discharge from the upstream catchment shown in yellow highlights on the figure below. Attenuation Basin 2 has not been sized to receive flow from this upstream catchment. Therefore, Attenuation Basin 2 may be undersized. This has the potential to increase flood risk downstream from the basin, which is third-party land. The area allowed for this attenuation basin is also quite constrained without much scope for increasing its size with regards to area.



Note: Infiltration testing has not been undertaken. The preferred method of disposal of surface water runoff is via infiltration. The applicant has stated that ground investigation will be undertaken later and that in the interim an attenuated discharge is proposed. Although an

attenuated discharge is an acceptable strategy at this stage, for a development of this size we would generally see the results of ground investigation at the outline application stage. Therefore, at the outline application stage the viability of infiltration has generally been fully investigated. Ground investigation will require groundwater monitoring over the wetter months of the year. Therefore, the ground investigation may take one year. The applicant should not leave this to the reserved matters stage or discharge of conditions. The viability of infiltration will need to be fully investigated before any further planning applications can be considered with regards to surface water drainage.

I object to the proposed development due to:

- a) The flood risk to part of the proposed development from an upstream catchment.** (Item 1 above - Insufficient assessment of the flood risk from the upstream catchment, and how this will be managed, has been undertaken as part of the Flood Risk Assessment).

- b) The potential increase in flood risk from the site affecting third-party land.** (Items 2-4 above - Insufficient information has been provided regarding SW management from the development. As such, we are unable to ascertain, to our satisfaction, the appropriateness of any SW management in accordance with the Ministerial statement 'Sustainable Drainage System' 2014, chapter 14 of the NPPF and Planning Policy Guidance (PPG). As relevant LLFA in this matter we are unable to confirm that the applicant has met DEFRA's technical guidance or relevant local and national policies concerning drainage).

Yours Sincerely,

**Alister Trendell,
Flood Risk Engineer.**