



Dorset Council, Flood Risk Management Team
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Date: 13 November 2023

Internal LLFA Consultation – Surface Water (SW) Management

Our Ref: PLN23-069

Proposal: Hybrid planning application consisting of: Full planning permission for a mixed-use development to erect a food store with cafe, plus office space and 2 No. flats above. Erect building for mixed commercial, business and service uses (Class E), (e.g. estate agents, hairdresser, funeral care, dentist, vet). Form vehicular and pedestrian accesses and parking. Form parking area for St. Gregory's Church and St Gregory's Primary School. Carry out landscaping works and associated engineering operations. (Demolish redundant agricultural buildings). Land west of Church Hill. Outline planning permission (to determine access) to erect up to 120 dwellings. Land off Butts Close and Schoolhouse Lane.

Your Ref: P/OUT/2023/02644

Location: Land west of Church Hill, and Land off Butts Close and Schoolhouse Lane, Marnhull

Grid Ref: 378015, 118653

To: Robert Lennis

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 the development of 10 or more residences and creation of more than 1000m² of floor space, we acknowledge that it qualifies as major development.

The area of development comprises of 2 separate and distinct sites. A flood risk assessment and surface water drainage strategy has been submitted for each site.

To support the application, the applicant has submitted the following drainage & flood risk related documentation:

- Report: Butt Close Flood Risk Assessment, by PFA Consulting, ref C798, rev 1.1 and dated 02/06/23.
- Report: Tess Square Flood Risk Assessment, by PFA Consulting, ref C798, rev 1 and dated 31/05/23.

As there are two distinct sites, I will provide separate assessments for each, but include them within the same response. I will refer to the sites as 1) Butt Close, and 2) Tess Square.

I can provide the following comments on flood risk to the development, and flood risk from the development.

Butt Close

Flood risk to the development

1. The Environment Agency's (EA) Risk of Flooding from Surface Water flood mapping indicates that a very small part of the site may be affected by surface water flooding. The Flood risk is associated with that part of the site is low risk with between a 0.1% and 1% chance of flooding in any year. However, overall, the flood risk is considered to be very low – less than a 0.1% chance of flooding in any year.
2. The EA's Flood Map for Planning indicates that the site is within flood zone 1 with a very low probability of flooding.

Overall, the flood risk to the site is acceptable.

Flood risk from the development

3. The method of limiting post development discharge rates to the QBAR rate is acceptable. The proposed volume estimates required for attenuation appear to be of the correct magnitude. A series of linked attenuation basins and underground storage areas is proposed. The percentage of volume provided in underground tanks should not be increased during the detailed design stage. During the detailed design, opportunities to increase the storage volume provided in open above ground basins should be investigated in order to reduce the amount provided in below ground storage tanks.
4. Although infiltration testing has not been undertaken on this particular site, the groundwater monitoring boreholes indicate that the site is unlikely to be suitable for infiltration of surface water as a viable method of discharge. Therefore, the proposed method of surface water disposal via an attenuated discharge is accepted, in principle. However, the location of the discharge point from the final attenuation basin has not been identified or included in the surface water drainage strategy drawing. I can't see that there is a watercourse of sewer near to the final attenuation basin. Nothing is shown on the survey for the site. The applicant is to indicate where the proposed surface water discharge point is located. Further details and approval from respective owners may also be required.

Tess Square

Flood risk to the development

5. The Environment Agency's (EA) Risk of Flooding from Surface Water flood mapping indicates that the northern part of the site is affected by surface water flooding. The source of this flooding is from a drainage line that traverses the site. The proposed built development is shown to be outside of this high-risk flood area of the site. The nearest proposed building to the drainage line is a café. It appears to be approximately 10m from the top of bank of the drainage line – this is acceptable. Proposed floor levels appear to be appropriate as the opposite side bank of the drainage line are lower than the southern side – hence the floodplain is essentially to the north and away from the proposed development.
6. The EA's Flood Map for Planning indicates that the site is within flood zone 1 with a very low probability of flooding.

Overall, the flood risk to the site is acceptable.

Flood risk from the development

7. The method of limiting post development discharge rates to the QBAR rate is acceptable. The proposed volume estimates required for attenuation appear to be of the correct magnitude. A series of linked attenuation basins and permeable paving underground storage areas is proposed. The percentage of volume provided in underground storage should not be increased during the detailed design stage. During the detailed design, opportunities to increase the storage volume provided in open above ground basins should be investigated in order to reduce the amount provided in below ground storage.
8. Infiltration testing has been undertaken on this site as well as groundwater monitoring. Results indicate that the site is unlikely to be suitable for infiltration of surface water as a viable method of discharge. Therefore, the proposed method of surface water disposal via an attenuated discharge is accepted, in principle. The discharge from the final basin is shown as the drainage line that traverses the northern part of the site.
9. On first review of the surface water drainage strategy drawing it appears that the main attenuation basin may be higher than the development. However, survey and design levels have been provided indicating that a gravity system is deliverable. Essentially, the new buildings will discharge surface water to the proposed attenuation basins. Whereas the proposed parking areas are to comprise of permeable paving and underground storage with an attenuated discharge. At this stage of the application, the strategy appears to be deliverable.

At this stage of the application, I recommend a holding objection. Our holding objection may be overcome by addressing item 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.

Please do not hesitate to contact me should you require further clarification of our position or the scope of additional information that is required. To assist in this respect, I suggest the applicant review our generic guidance note, which can be found at:
www.dorsetcouncil.gov.uk/localfloodrisk.

Best regards

Alister Trendell
Project Engineer
Place Services
Dorset Council

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