

From: [REDACTED]
Sent: 29 November 2022 11:53
To: [REDACTED]
Cc: [REDACTED]
Subject: P/FUL/2022/06840 - PLN22-070 - Redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities

Follow Up Flag: Follow up
Flag Status: Flagged

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: 29 November 2022

Internal LLFA Consultation – Surface Water (SW) Management



Our Ref: PLN22-070

Proposal: Redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities

Your Ref: P/FUL/2022/06840

Location: Knoll House Hotel Ferry Road Studland Swanage BH19 3AH

Grid Ref: 403090, 83274

To: Huw Williams

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 a development site of more than 1ha, we acknowledge that it qualifies as major development.

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

- Report: Flood Risk Assessment and Drainage Strategy Technical Note, by Patrick Parsons, Rev 02 and dated 21.10.22

The above report includes Appendices that include drawings and calculations

Flood Risk to the Site

- The Environment Agency's (EA) Flood Map for Planning indicates that the area of the site proposed for development is within Flood Zone 1 (with a low probability of fluvial flooding - 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 the site is in an area with a very low probability of flooding from surface water. (Less than a 1 in 1000 chance in any year).

The conclusions of the applicant's Flood Risk Assessment are generally agreed. The site is generally at very low risk of flooding.

Surface Water Management

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.

After reviewing the drainage strategy, I can provide the following comments:

1. The submitted drainage strategy undertakes an analysis of current surface water runoff rates based on existing conditions. Greenfield runoff rates have also been calculated. A restricted greenfield QBAR discharge rate of 9.7l/s for all events up to the 1 in 100 year + 40% climate change is proposed. This is a welcome and significant reduction from current runoff rates. It should be noted that the latest rainfall intensity climate change uplift for this area is 45%. This updated allowance will need to be included in calculations for the detailed design and is not required at this stage of the application.
2. The preferred strategy is to discharge surface water to ground via infiltration. The drainage report alludes to the soil not being suitable and mentions the previous application and the infiltration testing undertaken at that time. I have reviewed that aspect of the previous application and can confirm that infiltration testing was undertaken, and the results were not supportive of infiltration as a viable disposal method of surface water. Although the results have not been submitted for this application, I am satisfied that this issue has already been investigated to the LLFA's satisfaction and that infiltration is not viable for this site (unless the applicant wishes to submit new evidence).

3. A restricted surface water discharge to an existing pond is proposed. The pond appears to be on a separate land parcel. A new surface water pipe is also proposed to reach the pond. Evidence that the land is in the control of the applicant has not been provided. If it is not, then a legal agreement from the landowner and acceptance of the surface water discharge will need to be obtained. The evidence required to demonstrate that the applicant has permission to discharge to the existing pond is to be submitted at this stage before we can accept that the proposed surface water drainage strategy is viable and deliverable.
4. It is welcome that the existing total impermeable areas has been reduced. Green roofs, and permeable parking and hardstanding areas are proposed. This approach will also improve the quality of surface water runoff and improve biodiversity and amenity. This strategy is acceptable.
5. To achieve the proposed discharge rate of 9.7l/s the report states that '*on-site storage will consider a 40% allowance for climate change when calculating storage volumes.*' An estimate of the storage volumes required, the location, and the method of storage are not provided in the report or shown on the drainage strategy drawing. The following is required: an estimate of the storage volume required to restrict the flow rate to the design discharge rate, the location of the storage proposed, and the method of the storage proposed (it should be noted that the preferred storage method is in above ground storage such as an attenuation basin. The use of below ground storage must be justified and evidenced).

Due to the above, we recommend that a (Holding) Objection be applied to this proposal. Information should be submitted that address the issues raised in items 3 & 5 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.

Our (Holding) Objection may be overcome via the submission of further or additional details outlining a site-specific SW management scheme. Accordingly, we ask to be re-consulted on the SW scheme if further information is supplied. Our objection will be maintained until an adequate a SW scheme has been approved in-principle. We may at that stage request suitable planning condition/s and informative/s to cover detailed design, future maintenance and potential requirement for other permissions.

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.

Yours Sincerely,

**Alister Trendell,
Flood Risk Engineer.**