



Dorset Council, Flood Risk Management Team
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Lead FRM Officer: Alister Trendell
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Date: 25 September 2023

Internal LLFA Consultation – Surface Water (SW) Management

Our Ref: PLN22-070/2

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.

This is a follow response from my response dated 29 November 2022, and only discusses outstanding items from that assessment.

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.

The applicant has also just submitted the following:

- Drawing: Drainage Strategy, by Patrick Parsons, ref KHS-PPC-XX-XX-DR-C-0201, rev P3 and dated 24.08.23
- Letter: Discharge of Planning Condition 5, by Patrick Parsons, and dated 1 February 2023.

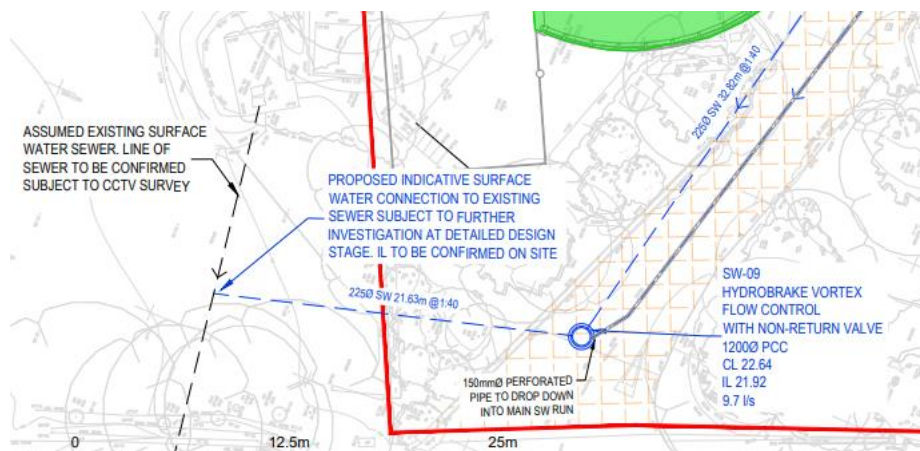
I don't believe there are conditions of approval yet, so I am unsure of the relevance of the above letter.

What is still outstanding is the location of discharge from the proposed surface water attenuation system. The November 2022 plans showed the discharge location to be a new pipe run across third party land to an existing pond to the northwest. The land did not appear to be in the control of the applicant. I therefore requested further evidence of approval from the owner of the land.

The latest plan shows a different discharge location. The amended proposed location for discharge is to the southeast of the site. The drainage strategy drawing provides some annotated notes regarding the new pipe and discharge.

These read:

- *'Proposed indicative surface water connection to existing sewer subject to further investigation at detailed design stage. IL to be confirmed on site.'*
- *'Assumed existing surface water sewer line of sewer to be confirmed subject to CCTV survey'*



There are still many unknowns with the proposed drainage discharge location.

- 1) This is a full application and so the application should include full details of the surface water drainage strategy. These have not been provided for the discharge location and proposed connection. Our asset information does not show any information for a surface water drainage line at this location. Information required to accept the proposed location for discharge includes, but not necessarily limited to, the following:
 - Who owns this drainage line.
 - Is there capacity for a new connection.
 - Have they given permission to connect to it.
 - If it is a private drainage line, then where does it discharge to and what condition is it in.

Due to the above, we recommend that a (Holding) Objection be applied to this proposal. Information should be submitted that address the issue raised in item 1 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 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.**