



**Dorset Council, Flood Risk Management Team**  
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**Lead FRM Officer:** Rob Hanson  
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**Date:** 19 September 2023

### **Internal LLFA Consultation – Surface Water (SW) Management**

**Our Ref:** PLN23-057

**Proposal:** Erect 41 No. retirement apartments including communal facilities & access, car parking and landscaping

**Your Ref:** P/FUL/2023/05051

**Location:** Land East Of Lidl, Christys Lane, Shaftesbury

**Grid Ref:** 386789, 123117

**To: Rob McDonald**

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 of 10 or more dwellings, we acknowledge that it qualifies as major development.

The site of the proposal is shown to fall within Flood Zone 1 (low risk of fluvial flooding) as indicated by the Environment Agency's (EA) indicative flood maps. Whilst mapping based on up to the 1-in-1000 year rainfall event indicates no modelled surface water flood risk to the development site itself. However the EA Risk of Flooding from Surface Water mapping indicates that there is predicted to be some areas of surface water flood risk nearby on Christys Lane from the 1-in-30 year rainfall event and upwards. However, this predicted surface water flood risk is not expected to impact access and egress to the proposed development site.

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.

To this end, the information supplied in relation to SW management includes the following:

- Land at Christy's Lane, Shaftesbury - Flood Risk Assessment Revision B (17<sup>th</sup> August 2023) by AWP

The document referenced above provides detail regarding drainage from the applicant's site. As a result, we can acknowledge the following:

- The applicant has followed the SuDS hierarchy and is prioritising infiltration as a means of surface water management.

- Ground investigations have been carried out which demonstrate that good infiltration rates can be achieved and that groundwater levels are not expected to impact on the functioning of the proposed soakaway.
- Underground geo-cellular tanks under the car parking area are proposed due to limited space.
- Wessex Water have stated in their comments that an attenuated discharge of surface water into their surface water sewer could be considered as a back-up position in the event that infiltration proves not to be viable.

**These documents provide the necessary detail to substantiate the proposed Surface Water strategy. We therefore have no objection to the application subject to the conditions and informatives at the end of this letter being included on any permission granted.**

Whilst we are willing to recommend conditions at this time, that applicant will need to at Discharge of Conditions (DoC) application stage, consider and address the following:

- As noted by the applicant the development site is located within an EA Source Protection Zone (SPZ3). The applicant should ensure that the finalised infiltration-based SuDS scheme design meets with all expected EA water quality standards.
- The LLFA also notes that the applicant has included drawings which indicate a foul sewer crossing the development site (pages 114/115 within the applicant's FRA). It is accepted that this is currently a private asset and that the drawings are indicative however the LLFA advises that the applicant should not build over or within 3m of this asset. As such it may be necessary to redirect this foul sewer before construction commences.

To ensure that the above elements are properly considered, we recommend the following condition be attached to any permission granted:

**CONDITION (1)**

No development shall take place until a detailed surface water management scheme for the site, based upon the hydrological and hydrogeological context of the development, and including clarification of how surface water is to be managed during construction, has been submitted to, and approved in writing by the local planning authority. The surface water scheme shall be fully implemented in accordance with the submitted details before the development is completed.

**REASON**

To prevent the increased risk of flooding, to improve and protect water quality, and to improve habitat and amenity.

**CONDITION (2)**

No development shall take place until details of maintenance & management of both the surface water sustainable drainage scheme and any receiving system have been submitted to and approved in writing by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details. These should include a plan for the lifetime of the development, the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.

**REASON**

To ensure future maintenance of the surface water drainage system, and to prevent the increased risk of flooding.

**INFORMATIVES**

- The applicant is advised to have early discussions with Wessex Water in relation to the possible adoption of SuDS features in order to ensure that the final design of the proposed infiltration feature is in line with their design requirements.

Please do not hesitate to contact me should you require further clarification of our position or the scope of any additional information that is required.

**Yours Sincerely,**

**Rob Hanson,  
Flood Risk Engineer.**