



Dorset Council, Flood Risk Management Team
Dorset Highways, County Hall, Dorchester

LLFAPlanning@dorsetcouncil.gov.uk

Lead FRM Officer: Rob Hanson
Direct Dial: 01305 221838

Date: 07 October 2024

Internal LLFA Consultation – Surface Water (SW) Management

Our Ref: PLN24-056

Proposal: Redevelopment for erection of retirement living accommodation comprising 48 apartments, 25 cottages, communal facilities, access, car parking and landscaping to create an integrated retirement community

Your Ref: P/FUL/2024/04613

Location: Land to rear of 156-172 South Street, Bridport. DT6 3NP

Grid Ref: 346507, 92272

To: Penny Canning

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

The site of the proposal is located within Flood Zones 2 and 3, as shown on the Environment Agency's (EA) indicative flood maps. Whilst mapping based on the modelled 1-in-30 year rainfall event and upwards reveal no surface water flood risk to the actual site. A minor area of surface water ponding is indicated adjacent to the site on the east side from the 1-in-100 year rainfall event and upwards.

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 surface 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:

- Flood Risk Assessment for South Street, Bridport – Churchill Retirement Living (6th June 2024) 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 but discounted the use of infiltration SuDS due to ground conditions not being suitable.
- The applicant proposes to attenuate and discharge surface water at a restricted rate into the adjacent main rivers at the confluence.

Having reviewed the proposed surface water management scheme as found in the applicant's Flood Risk Assessment the LLFA would like to advise the planning officer of the following:

- The site is located within Flood Zones 2 and 3 and therefore the application should be referred to the Environment Agency (if it hasn't been already) for their comments in relation to the predicted risk of fluvial flooding.
- We would like to advise that LLFA will not be providing a full and complete consultation response at this time in relation to the proposed SW drainage scheme. We request a Teams meeting with the applicant's drainage engineers to discuss the proposals to pump surface water into the adjacent watercourse. We would like to understand the rationale behind the proposed design and to discuss whether there is any scope to minimise the use of pumping within the proposed scheme. Once we have had this discussion the LLFA will submit an updated consultation response to these proposals.

Please can the applicant's drainage engineer make contact with the LLFA so that a meeting can be arranged to discuss the proposed surface water drainage.

INFORMATIVES

- If the applicant wishes to offer for adoption any highways drainage to DC, they should contact DC Highway's Development team at DLI@dorsetcouncil.gov.uk as soon as possible to ensure that any highways drainage proposals meet DCC's design requirements.
- An Environmental Permit may be required from the EA, as relevant regulator for all works to a designated Main River that take place in, under or over, or as prescribed under relevant byelaws in accordance with section 109 of the Water Resources Act 1991. To clarify the Environment Agency's requirements, the applicant should contact the relevant department by emailing floodriskpermit@environment-agency.gov.uk
- 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 surface water drainage is in line with their design requirements.

Yours Sincerely,

**Rob Hanson,
Flood Risk Engineer.**



Dorset Council, Flood Risk Management Team
Dorset Highways, County Hall, Dorchester

LLFAPlanning@dorsetcouncil.gov.uk

Lead FRM Officer: Rob Hanson
Direct Dial: 01305 221838

Date: 21 February 2025

Internal LLFA Consultation – Surface Water (SW) Management

Our Ref: PLN24-056/2

Proposal: Redevelopment for erection of retirement living accommodation comprising 48 apartments, 25 cottages, communal facilities, access, car parking and landscaping to create an integrated retirement community

Your Ref: P/FUL/2024/04613

Location: Land to rear of 156-172 South Street, Bridport. DT6 3NP

Grid Ref: 346507, 92272

To: Penny Canning

We write in response to the submission of a draft update to the Flood Risk Assessment (FRA) for the above proposed development. This has been sent to us as relevant Lead Local Flood Authority (LLFA), and statutory consultee for Surface Water (SW) management in respect of major development.

For continuity we reiterate that the site of the proposal is located within Flood Zones 2 and 3, as shown on the Environment Agency's (EA) indicative flood maps. Whilst mapping based on the modelled 1-in-30 year rainfall event and upwards reveal no surface water flood risk to the actual site. A minor area of surface water ponding is indicated adjacent to the site on the east side from the 1-in-100 year rainfall event and upwards.

We reiterate that all (major) development proposals are to be supported by a site-specific drainage strategy in accordance with the recommendations of the National Planning Policy Framework (December 2024 - NPPF), relevant technical guidance and best practice. Accordingly, the management of surface water runoff must demonstrate that the proposed development is not to be placed at risk and that no off-site worsening is to result.

In our previous response we (the LLFA) requested a Teams meeting with the applicant's drainage engineers to discuss the proposals to pump surface water into the adjacent watercourse. We wanted to gain a better understanding of the rationale behind the proposed design and to discuss whether there is any scope to minimise the use of pumping within the proposed scheme. Following on from that meeting the applicant has now provided the following document in relation to surface water management:

- Flood Risk Assessment for South Street, Bridport – Churchill Retirement Living (20th November 2025) by AWP (Revision A)

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 but discounted the use of infiltration SuDS due to ground conditions not being suitable.

- The applicant proposes to attenuate and discharge surface water at a restricted rate into the adjacent main rivers at the confluence.
- The applicant has agreed that *'the final drainage scheme should seek to prioritise attenuated **gravity** discharges to the River Britton as far as practicable, before relying on the use of surface water pumps.'*
- The re-development of this brownfield site will result in reduced surface water discharge rates from the site.

Important note: As described above, the proposed development site is located within Flood Zones 2 and 3 and therefore we advise that comment should be sought from the Environment Agency in relation to fluvial/tidal flood risk.

However, in relation to flood risk from local sources (surface water, groundwater, ordinary watercourses) the LLFA can advise that the site is considered to be at low risk of flooding from these sources. The applicant has also submitted sufficient detail to demonstrate that a viable surface water management strategy can be delivered for the proposed development.

Therefore we have no objection to the application subject to the conditions and informatives at the end of this letter being included on 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)

Prior to occupation of the development, details of maintenance & management of both the surface water sustainable drainage scheme and any receiving system shall be 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.

Please send us a copy of any decision notice issued in respect of this application for our records.

INFORMATIVES

- If the applicant wishes to offer for adoption any highways drainage to DC, they should contact DC Highway's Development team at DLI@dorsetcouncil.gov.uk as soon as possible to ensure that any highways drainage proposals meet DCC's design requirements.
- An Environmental Permit may be required from the EA, as relevant regulator for all works to a designated Main River that take place in, under or over, or as prescribed under relevant byelaws in accordance with section 109 of the Water Resources Act 1991. To clarify the Environment

Agency's requirements, the applicant should contact the relevant department by emailing floodriskpermit@environment-agency.gov.uk

- 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 surface water drainage is in line with their design requirements.

Yours Sincerely,

**Rob Hanson,
Flood Risk Engineer.**