

# Consultation Response

**To:** Planning Services

**From:** Lead Local Flood Authority

**Date:** 4<sup>th</sup> June 2020

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**Application number:** S/19/1891

**Proposal:** Erection of storage or distribution building (use class B8), ancillary buildings, offices, landscaping, vehicular parking, bus depot, creation of 2no. passenger vehicle accesses and associated works. | Symmetry Park (Phase 6) Shrivenham Road South Marston Swindon

**Location:** Symmetry Park, New Eastern Villages, Swindon

**Recommendation** – Additional Information required / Approval with conditions

## Detailed Comments

We have reviewed the further information submitted on the 3<sup>rd</sup> June and are disappointed to see that our comments have still not been addressed. The proposed drainage plan shows that other than the ponds, interceptors are the only other measure proposed to deal with water quality. Some areas need 3 stages of treatment. An interceptor alone is not a suitable solution for treatment in line with current guidance and will only be considered as part of a treatment train as a last resort.

Discussions with the applicant's consultant stated that swales and permeable paving were going to be introduced but this has not materialised. An adequate treatment train must be provided.

The drainage strategy plan submitted for the previous application included filter drains in the treatment train. These have now been omitted. There seem to be further channel drains than the previous strategy and an introduction of kerb drains which provide a further maintenance liability. Therefore we feel the current plan demonstrates that the current proposed strategy will have an increased negative impact on water quality.

Water Quality as well as Water Quantity needs to be managed appropriately. The Environment Agency currently class the status of the River Cole as poor which is the receptor of the drainage from the site. In line with current national guidance such as CIRIA C753, we will expect a treatment train to be provided with a number of SuDS measures to

ensure water quality is met. This has been captured in the SuDS Vision and Section 2.5.1 - Great Stall West, of the SuDS Vision SPD states;

*“Parking spaces must make use source control measures such as permeable paving with subsurface storage which can be increased to serve further areas unsuitable for such measures. Alternatively they can be drained over the edge to other measures such as linear swales and filter strips where this is more practical.”*

The SuDS Vision SPD also states that for large roof areas, rainwater harvesting / greywater recycling must be considered or where it is appropriate, green roofs / blue roofs can be considered instead of or in conjunction with the water recycling systems. If they are not incorporated, the developer must justify why this is not viable.

Notwithstanding this, we believe there is space available throughout the site that can incorporate adequate SuDS to meet the requirements and therefore we are happy for this to be addressed through a pre-commencement condition. Our suggested condition is below;

Development shall not begin until a detailed Surface Water Management Strategy for the site, has been submitted to, and approved in writing by the Local Planning Authority. The strategy shall include:

- Evidence that the proposed flows from the site will be restricted to the previously agreed Qbar greenfield runoff rates for all events up to and including the 1 in 100 year plus 40% climate change event;
- Details of how the drainage strategy has been designed to incorporate SuDS techniques to manage water quantity and maintain water quality in accordance with adopted policy and best practice guidance including the New Eastern Villages SuDS Vision SPD and the SuDS Manual C753;
- Detailed drainage plan showing the location of the proposed SuDS and drainage network;
- Detailed cross sections and construction details of the proposed SuDS measures;
- Details of how the strategy shall be maintained and managed after completion;
- Details of how water quality shall be maintained during and after construction;
- Detailed drainage calculations for all rainfall events up to and including the 1 in 100 year plus climate change event to demonstrate that all SuDS features and the drainage network can cater for the critical storm event for its lifetime; and
- The submission of evidence relating to new accepted outfalls from the site, particularly from any third party network owners;

The scheme shall be implemented in accordance with the approved details.

Reason: To ensure development does not increase the risk of flooding elsewhere; in accordance with Paragraph 155 of the National Planning Policy Framework (NPPF) and Policy EN6 of the adopted Swindon Local Plan 2026.

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