

Ms Sarah James
Bath & North East Somerset Council
Planning Services
Trimbridge House Trim Street
Bath
Avon
BA1 2DP

Our ref: WX/2010/116570/01-L01
Your ref: 10/04015
Date: 25 October 2010

Dear Ms James

ERECTION 112NO. DWELLINGS WITH ACCESS FROM WITHIES PARK (INCLUDING A NEW BRIDGE ACROSS THE RIVER SOMER), LANDSCAPING AND ASSOCIATED WORKS AT PARCEL 0058, CAUTLETTS CLOSE, MIDSOMER NORTON

Thank you for your consultation regarding the above which was received on the 29th September 2010.

At present the Environment Agency objects to the propose development due to an inadequate Flood Risk Assessment (FRA).

In particular, the submitted FRA currently fails to demonstrate the viability of the surface water drainage scheme and ensure that the flood risk to the surrounding area will not increase as a result of this development.

We must see calculations to support the attenuation volume proposed and how this can be achieved in the pond and culvert. This should show the pre-development and post-development run-off rates and the attenuation volume required for the 1 in 100 year storm plus climate change. This must allow for a submerged outfall and we must be satisfied that there will be enough storage on site for the worst case scenario. We also require dimensions of the pond and culvert to show how the required volume could be accommodated.

Further clarification is required regarding the new bridge over the River Somer. New bridges must be designed to be free span, not displace any flood water and not inhibit access to the river for maintenance. The span of the bridge must be above the 1 in 100 year flood level plus climate change and with an appropriate freeboard of at least 600mm. The agent will need to confirm what the in channel flood level is for the 1 in 100 plus climate change event. They should also explain how access to the river bank will be maintained around the bridge. Any structure will also require separate Flood Defence Consent from the Environment Agency.

The FRA does not currently discuss the use of the SuDS treatment train and its use

Environment Agency
Rivers House East Quay, Bridgwater, Somerset, TA6 4YS.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

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on this development. Whilst we welcome the use of a sustainable drainage detention basin, no discussion has been undertaken on how surface water reaches the pond or methods of dealing with surface water at source. We do not encourage piped systems as a sustainable method of conveyance. Justification should be provided on why other methods have not been used such as carrier drains, filter strips or swales. Infiltration methods are not the only form of SuDS.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS involve a range of techniques including permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

Although it may not count towards your formal storage volume, additional attenuation storage and at source SuDS techniques such as permeable paving or rainwater harvesting can be used on site, which could also act as pre-treatment before discharge into the pond. As we have previously stated we do not support underground tank systems on greenfield sites due to their expense, maintenance requirements, and that overall they offer little sustainability. On a greenfield site we would expect more sustainable techniques to be designed into the proposals. Features such as swales, conveyance strips would provide more sustainable storage and movement of water if they could be incorporated. Approved Document Part H of the Building Regulations 2000 establishes a hierarchy for surface water disposal, which encourages a SuDS approach.

The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles.

In addition to addressing surface water drainage the FRA should also have regard to the Strategic Flood Risk Assessment (SFRA) Level 2 that has been completed for Midsomer Norton and Radstock. This includes a detailed assessment of all sources of flooding in the settlement. The applicant should have regard to the information provided. For example whether the residual risk of the flood alleviation scheme failing affects the site.

For the LPA's information we have recently received additional information from the agent (Banners Gate) seeking to address the issues above. When we have reviewed this information we will provide further comments to the Local Planning Authority.

If you have any queries regarding the above please contact me on the number below.

Yours sincerely

Mr Andy Reading
Planning Liaison Officer
Direct dial 01278 484534
Direct fax 01278 452985
Direct e-mail andy.reading@environment-agency.gov.uk

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