

SMPC response to the draft NEV SuDS Vision

31.08.2016

South Marston Parish Council wishes to contribute further to the development of the NEV SuDS Strategy through this second draft SPD consultation. We remain disappointed that SBC Flood Authority personnel did not engage with us as requested following the Local Plan enquiry in 2014 and following the initial consultation in January 2016. This would have avoided having to make the further comments below to ensure their understanding of surface water flow across the South Marston parish area.

1. Timing of SuDS proposals

We are pleased to see that timing of SuDS design as stated in the table on page 38 includes the timing of outline design of SuDS methods and maintenance approach. However, such a SuDS design document needs to take account of road and ROW networks within any planning application in a way that maximises opportunities for roadside channels and culverts to divert or disperse surface water into swales or basins. The complete highways network may not be available at outline application stage. It may therefore be appropriate for the draft SPD to state that, in such cases, the detailed SuDS design must be a reserved matter on grant of outline permission or submitted at masterplanning stage. It is important that such detailed SuDS proposals should be fully consulted upon and agreed prior to formal submission of any detailed planning application.

2. We object to the South Marston summary statement on page 19:

'The village of South Marston was affected by flooding in July 2007 and the EA surface water flood maps illustrate that there are a number of surface water flow routes through the proposed development site. Retaining existing drainage features through the proposed green corridors leading to South Marston Brook and the application of SuDS such as swales and attenuation basins, will maintain and control the flow routes through the development to ensure the flood risk is not increased elsewhere (p19)'.

This second sentence is incorrect and, through lack of understanding of water flow across the area, is actually in conflict with later statements in Section 3 of the strategy.

We believe that some of the existing flow routes will no longer be appropriate since they cut through the individual development parcels and will simply increase the overall risk to new and existing properties en route. It would make more sense to develop SuDS measures that fully utilise the retained green infrastructure within the development and roadside attenuation alongside new road or cycleway construction. Such a strategy could be used to divert, store or disperse surface water flow to where it enhances the value of green infrastructure and carries less flood risk to properties.

Our proposal is consistent with generic statements in Section 3: *'Developers must demonstrate that their proposals maximise the opportunities for improving drainage in the area and reduce the risk of flooding to neighbouring communities where practicable. This requirement is particularly pertinent to any proposed development areas and their associated infrastructure where there are existing watercourses or flow routes flowing through them which provide a drainage function to neighbouring*

land and sufficient corridors must be provided to maintain, control and enhance existing flood flow routes to reduce the risk of flooding to existing residential areas. Opportunities must be thoroughly investigated and unless proved impracticable they must be incorporated into the relevant outline planning application(s) for the NEV (p23)'.

Relevant South Marston areas adjoining NEV development which lie in the path of existing surface water routes include Thornhill Industrial Estate, Ash Gardens, Manor Farm and Farmyard, Southview Cottages, Red House, Manor Cottages and South Marston Farm.

3. Public rights of way

'Public rights of way and cycle routes should be drained over the edge wherever feasible, without collecting flows. Over the edge drainage is preferred, although special consideration should be given at low points, or flat areas to ensure highway flooding does not occur (table page 26)'

We propose the addition here of the relevance of culverts. Within South Marston NEV development, new cycleways are planned which run both west/east and north/south. Over the edge measures are relevant for the first, but adequate culverting will be required for the second. This reinforces the need to ensure there are clearly defined routes for surface water flow west/east to maximise the utility of any culverts.

4. Underpasses

'The drainage of any underpasses must be designed to prevent flooding in all rainfall events up to a 1 in 100 plus climate change event (page 27)'.

As noted in our original response, the definition of underpasses should make specific mention of including highway tunnels under the railway, in particular for critical-use highways, but also for Rights of Way. Within the NEV, critical-use highways are the improved railway tunnel at Carpenters Arms exit onto the A420, and the new road tunnel access to Rowborough which is likely to be in an area currently prone to flooding. In terms of footpaths and cycleways, this will apply to the potential use of existing tunnels under the railway that might be utilised for a Right of Way from Rowborough to the A420.

5. SuDS scheme consultees should include parish councils

The process diagram on page 38 rightly includes those whose responsibility includes regulation, but the 'key consultees' column includes those who may take on responsibility for maintenance etc. We would argue that parish councils should be considered appropriate consultees for SuDS proposals in any case, but particularly as they may be the adopters of green space and community facilities which incorporate essential parts of the SuDS proposals. It is quite evident that, in the particular case of the NEV, the 'Lead Local Flood Authority' has not adequately engaged with the parish council on identifying flood risk despite requested requests since 2014, and this may be why both the initial draft of this SPD and this revision are less than accurate in relation to South Marston.

6. Potential funding options:

Paragraph 4.2.1. states that service management companies could take on maintenance arrangements as follows:

a) *'Through service charge...*

- b) *Through model agreement and commuted sums paid by the developer to the Maintenance Company.*
- c) *Through Charitable Trusts or Not-for-profit companies which could also serve as Maintenance Companies.*
- d) *By working with SBC, parish councils and Thames Water to set up a 'NEV Green Infrastructure Management Company'.*
- e) *In partnership with SBC and/or parish councils*
- f) *Securing bonds to adopt and manage infrastructure'.*

We feel this is format is confusing, mixing responsible body and sources of funding for maintenance, without clarifying when and when not the developer should be responsible for providing commuted sums for maintenance. The text that follows the list does not help with this. For instance, can a 'NEV Green Infrastructure Management Company' benefit from commuted sum payments in the same way as a designated 'Maintenance Company'.

7. Village specific appendices

Great Stall East identifies drainage routes crossing or bounding the A420, but the subsequent text only talks about the visibility of SuDS measures from the A420, not managing the risk of flooding on the A420 itself apart from that part of the road that lies within the Flood Zone. It should specifically mention the need for keeping the A420 clear of flooding along the full boundary with Great Stall East.

South Marston: Despite concerns expressed previously to the Flood Authority, the text still does not identify the extent of surface water flow from west to east across the proposed development area north of the A420. The text now makes reference to the Environment Agency surface water flood map, but fails to follow through with the implications of this.

As identified in our response at point 2 above, the following statement is incorrect: *'These are mainly through the proposed green corridors between the proposed development parcels and by retaining the existing watercourses and swales in this area as well as introducing new SuDS such as swales and attenuation basins, will maintain and control the flow routes safely through the development to ensure flood risk is not increased elsewhere'*. This is because at least two key drainage paths from Thornhill Road to Old Vicarage Lane are missing from the map on page 81. This is of particular importance since these will be affected by housing parcels and road construction. Perhaps the responsible officers will finally engage with the parish council to ensure an appropriate village specific appendix can be prepared?

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