

# INTERNAL MEMORANDUM

FROM: Flood Risk Management Team

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Date: 02/08/2021

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**Application:** Outline planning application for demolition of 54 and 56 Farleigh Road; residential development of up to 125 dwellings (Class C3); strategic landscaping and earthworks, surface water drainage and all other ancillary infrastructure and enabling works with means of site access (excluding internal roads) from the new junction off Farleigh Road for approval; all other matters (internal access, layout, appearance, scale and landscaping) reserved for subsequent approval

**Reference Number:** 21/P/1766/OUT

**Location:** Land At Farleigh Farm And, 54 And 56 Farleigh Road, Backwell

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**Formal comments regarding the above.** The Flood Risk Management (Drainage) Team have the following comments to make.

Information assessed:

- Flood Risk Assessment and Drainage Strategy – April 2021

The Flood Risk Team objects to the application as it has not demonstrated that flood risk will not be increased and specifically for the following reasons:

- **Surface water flood risk** - There is a low risk surface water flow route through the site that has been acknowledged in the Flood Risk Assessment, but there is insufficient detail provided on how this will be mitigated. An explanation of how the flows will be mitigated against in the design of the proposed development should be provided. This links through to how exceedance design will be managed, which will be complicated on a site which has steep topography. This will be a design constraint and may have an impact on the master planning of the development and potential density that can be achieved and hence requires a detailed explanation at outline stage.
- **Volume of discharge** – The approach of volume control by reducing flows to QBar for all events up to a 1 in 100 year event plus climate change is supported. However, it is incorrect to think that this will provide a significant benefit downstream. It will reduce peak flows during extreme events and the volume of discharge will be spread over a longer period, but the total volume discharged will be the same. A benefit such as this cannot be determined unless catchment modelling has been undertaken.
- **Discharge Location** – A discharge location has not been adequately defined. There are four options that have been discussed with the Flood Risk Assessment, with little detail provided for each option. Viable options must be presented to demonstrate that there is a viable surface water discharge destination from the proposed development site.
- **Water Quality** – The indicative proposals are for an offline detention basin, this does not

provide any water quality benefits as the water will not flow through the feature in normal rainfall events. According the SuDS Manual (CIRIA C753) a detention basin will not provide effective water quality treatment and not mitigate the pollution generated by the development proposals. The simple index approach to assessing water quality should be undertaken to determine the level of treatment required.

- **Indicative layout** – The indicative layout does not provide a realistic solution for the surface water drainage mitigation. The basin is shown as being 1.3m deep and yet in places it will be 5m deep from top of bank to the base of the pond. The steepness of the slope will be unacceptable and will not meet recommended safety standards. There also appear to be trees proposed on the top of the bank of the basin, which will prevent any form of maintenance access. This attenuation feature will be unsafe and unable to be maintained for the lifetime of the development and therefore not in accordance with NPPF paragraph 169. Insufficient space has been allocated for this feature on the indicative masterplan.

**ADVISORY NOTE:** The implementation of Sewerage Sector Guidance will allow Wessex Water to adopt more sustainable drainage features, therefore we recommend that a discussion with Wessex Water takes place at an early stage.