

## Planning

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**Subject:** FW: PLN20-069/5 - WP/20/00692/DCC - Portland Port

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**From:** FloodRiskManagement <floodriskmanagement@dorsetcc.gov.uk>

**Sent:** 14 September 2021 14:45

**To:** Planning <planning@dorsetcc.gov.uk>

**Subject:** PLN20-069/5 - WP/20/00692/DCC - Portland Port



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

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**Lead FRM Officer:** Rob Hanson

**Date:** 14 September 2021

### **Internal LLFA Consultation – Surface Water (SW) Management**

**Our Ref:** PLN20-069/5

**Proposal:** Construction of an energy recovery facility with ancillary buildings and works including administrative facilities, gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths and existing off-site electrical sub-station, with si

**Your Ref:** WP/20/00692/DCC

**Location:** Portland Port, Castletown, Portland DT5 1PP

**Grid Ref:** 368998, 74438

We write in response to the above (re)consultation request of 17/08/21, 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 Waste / Minerals Site, we acknowledge that it qualifies as major development.

For continuity we reiterate that the brownfield site of the proposal is shown to fall largely within Flood Zone 1 (low risk of fluvial / tidal flooding), as indicated by the Environment Agency's (EA) indicative flood maps. Whilst according to the EA's Risk of Flooding from SW (RoFfSW) mapping there is no theoretical risk of pluvial flooding to the site up to the 1-in-100 year rainfall event with only some isolated ponding shown to develop during the 1-in-1000 year rainfall event. So overall the flood risk to the site is considered low.

However due to the proximity of coastal waters, the site is very close or directly adjacent to areas of Flood Zone 2 along both the north and east boundaries. Whilst, according to the EA's Risk of Flooding from SW (RoFfSW) mapping, the site is near to an additional small area of surface water ponding just outside the north boundary of the site during the 1-in-100 year rainfall event and above.

We reiterate that all (major) development proposals are to be supported by a site-specific drainage strategy in accordance with the recommendations of the revised National Planning Policy Framework (July 2018 –

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.

This consultation response follows comments by us dated 11/11/20. In our previous response we commented on prevailing flood risk and outlined our position accordingly. We recommend you review any earlier response from us, as a reminder of the rationale behind our approach thus far.

We advised that a free discharge of surface water to the sea would be allowable at this location as it will have no discernible impact on the downstream tidal flood risk. We also said that surcharging of the system needed to be avoided during normal conditions as exceedance flows directly to tidal waters could conceivably convey contaminants off site.

Therefore, as the applicant is proposing to use the existing surface water outfalls, we advised that a survey of these pipes would be needed. This would ascertain whether the proposed surface water discharge route is viable and whether additional attenuation on site would be needed, given the existing pipes capacity and condition.

Following our comments, and in addition to any previous submissions, we note that the applicant has provided the following:

- Powerfuel - Portland Energy Recover Facility – Flood Risk Assessment Addendum by AWP – August 2021
- Preliminary Drainage Layout by AWP – Drawing number PDL-101 (Rev D)

The documents referenced above provide additional details regarding drainage from the applicant's site. As a result, we can acknowledge the following:

- The applicant has commissioned CCTV drainage surveys and reviewed historic drainage records for the current site.
- The two eastern outfalls which discharge into Balaclava Bay have adequate capacity to manage surface water flows from the proposed roof areas.
- The northern outfall has insufficient capacity to drain the proposed yard and trafficked areas unattenuated as originally proposed. Therefore, the discharge of surface water from the yard and trafficked area into the northern outfall would need to be restricted further and attenuated on site.
- The updated revision D of the Preliminary Drainage Layout shows that there is adequate space on site for, not only the previously proposed swales but, additional surface water attenuation within underground geo-cellular tanks. This proposal could prevent flooding on site for up to the 1-in-100 year plus 40% climate change rainfall event.
- Existing outfalls which serve the site fall under the ownership and responsibility of Portland Port Ltd (PPL). Section 3.5 of the FRA Addendum states that the 'ability to utilise the existing surface water outfalls and a commitment to ensure they remain operational throughout the development's lifetime has been agreed with PPL'.

**Along with the previously submitted Flood Risk Assessment, the FRA addendum document provides the necessary detail to substantiate the proposed Surface Water strategy. We therefore have no objection to the application subject to the conditions 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)**

No development shall take place until details of maintenance & management of both the surface water sustainable drainage scheme and any receiving system have been 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.

**CONDITION (3)**

No development shall take place until further evidence is submitted to show that a full CCTV survey of the existing surface water outfalls has been carried out along with any remedial work to ensure that the surface water outfall pipes have the required capacity and are in an acceptable condition to manage the necessary surface water discharges from the site into the sea.

**REASON**

To ensure the full functioning of the surface water drainage system and to prevent an increased risk of flooding and to improve and protect water quality.

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

Please do not hesitate to contact me should you require further clarification of our position or the scope of any additional information that is required.

**Yours Sincerely,**

**Rob Hanson,  
Flood Risk Engineer.**