

Wiltshire Council Planning Consultation Response

28 Jul 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Adam Madge

Application No: PL/2024/05527 – Land South of Westwells Road, Westwells Road, Neston, SN13 9GB
Redevelopment of site to deliver extension to existing Spring Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) diverted Public Rights of Ways (f) hard and soft, green and blue, landscaping and (g) other ancillary and auxiliary forms of development.

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Support subject to conditions (please set out below)
<input type="checkbox"/>	Object (for reasons set out below)
<input type="checkbox"/>	No objections

Matters Considered:

Documents Reviewed:

- Application Form
- BREEAM Letter
- Detailed Soft Landscape Plans
- Drainage Strategy
- Planning Statement
- Spring Park Data Centre Expansion
- Proposed Hard & Soft Landscaping Plan
- Existing Site Plan
- Proposed Master Plan
- Proposed Site Plan
- Proposed Water Treatment Plant – Splitter Building Elevations
- Proposed Water Treatment Plant – Splitter Building Plans & Sections
- Site Location Plan
- Drainage & Flood Risk Response
- Proposed Site & Landscape Cross Sections
- Sequential Test
- Sequential Test Appendix A, B, C, D

The application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

It is noted there has been significant local discussion regarding this development, and any potential impact on local flood risk. The LLFA have reviewed local concerns but have determined a position of 'no objection, subject to conditions' is most appropriate.

Following this local concern, the LPA asked the applicant to undertake a sequential test to demonstrate there are no viable and reasonable alternatives to this site at lower risk of flooding (in accordance with NPPF Paragraph 175). The LPA will need to assess the acceptability of the Sequential Test; we do not have any comments to make on this document. Other consultees have raised the point that data centres can be isolated and therefore the search area for the Sequential Test should be wider; this point will need to be considered by the LPA to determine whether the search area within the currently submitted sequential test is valid.

We would like to update our previous response to draw attention to aspects raised by various residents in order to aid the LPA in forming their decision.

- The site is solely within Flood Zone 1 for Fluvial Flooding as demonstrated on the RoFRS maps.
- The site is identified to be at risk of Pluvial (surface water flooding) in a variety of events including the 1 in 30 yr (High), 1 in 100 yr (Medium) and 1 in 1000 yr (Low) return period events. It is noted based on the EA RoFSW Maps produced under the NAFRA2 dataset, that the majority of surface water flooding on site is predicted to be 0 – 200mm depth (see Figures 1 & 2 below).
- The site is identified within the SFRA to be unlikely to be at risk of groundwater flooding.

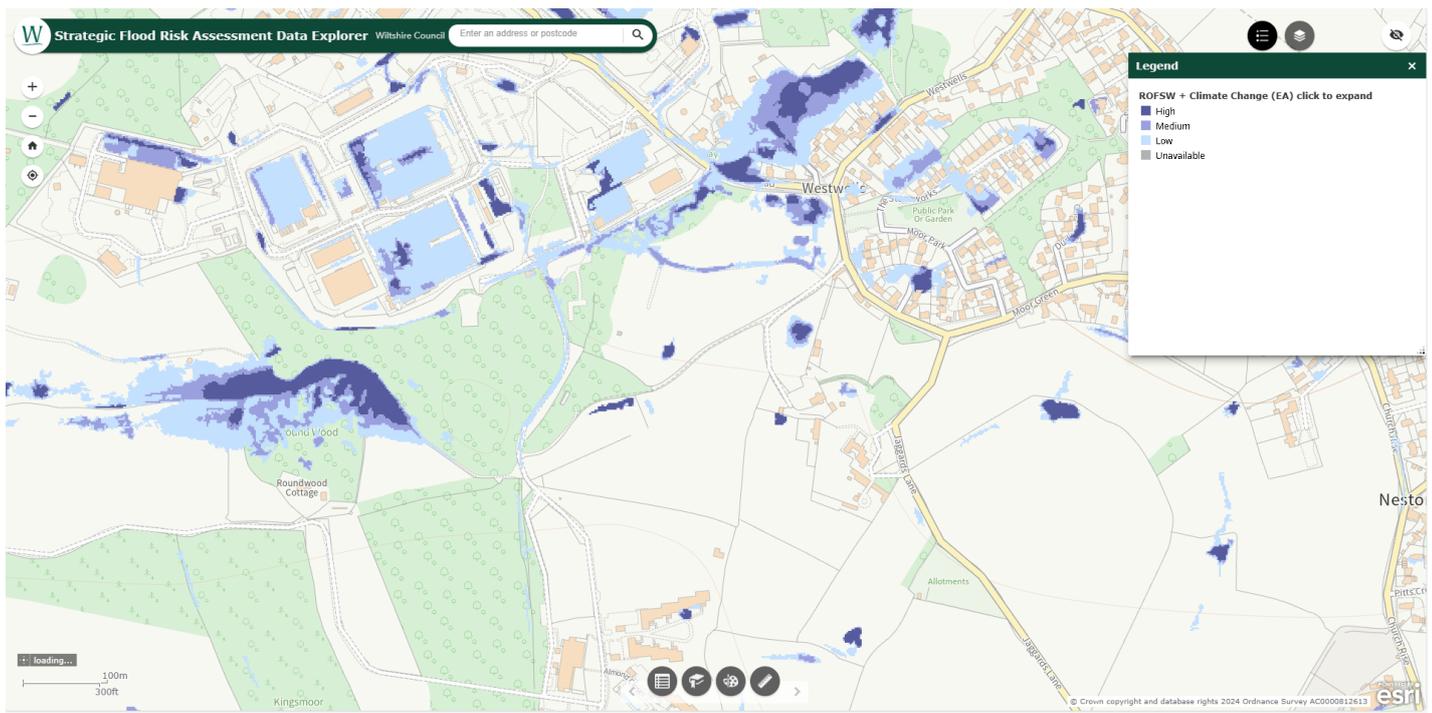


Figure 1: RoFSW Mapping – All Flood Depths

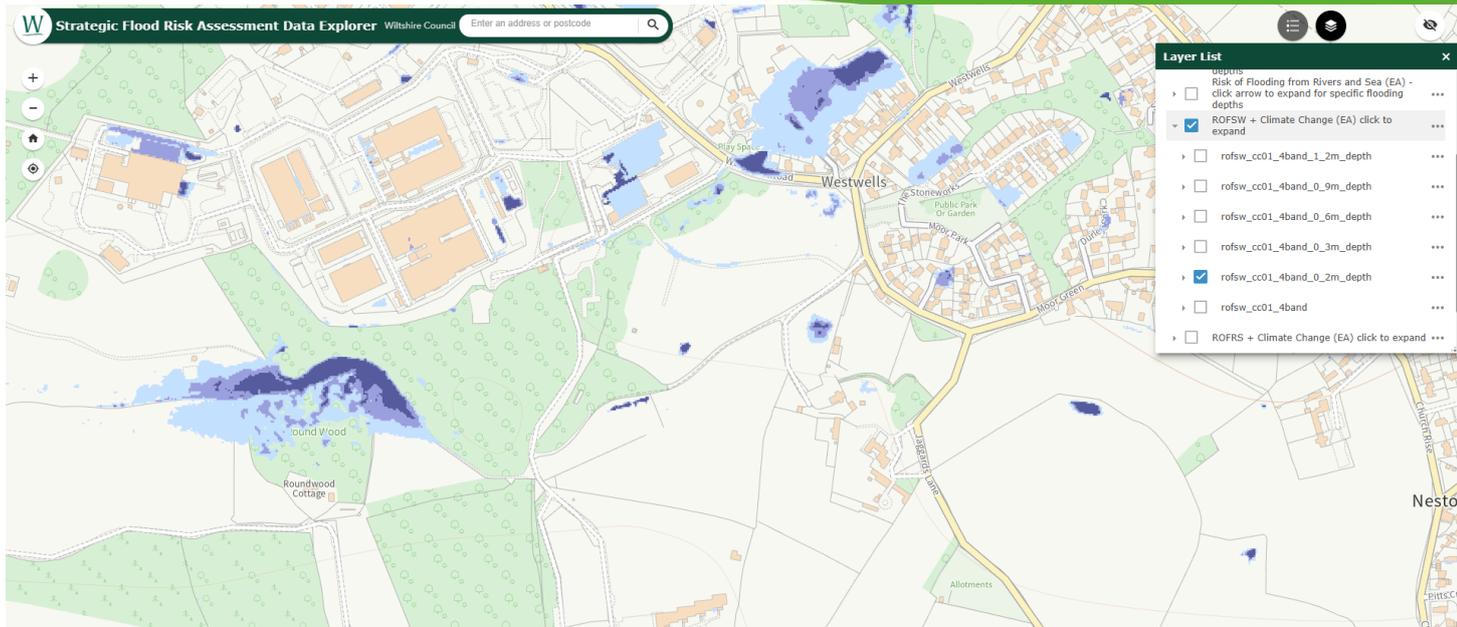


Figure 2: EA RoFSW Mapping - Flood Depths Exceeding 200mm

It is noted that the applicant has not provided a rainfall-on-mesh 2D flood model to compare the baseline and post development scenarios (as noted by residents). Given the historical flood issues within the Westwells this would be a proportionally appropriate request for the applicant to provide to help relieve concerns of the residents downstream of the development site. We would recommend that this analysis is provided prior to determination of planning and then updated (to a 1d-2d model) once the detailed drainage design has been completed.

When we have independently assessed the topography of the site and probable overland flow routes it is noted that:

- The full site predominantly acts as a source of overland flow paths towards Westwells (Figure 3) – through appropriate controls and mitigations, including detailed consideration of overland exceedance flow routes, there is potential for the proposals to reduce downstream flood risk to Westwells.
- There is a significant natural upstream catchment which may feed a natural overland flow path across the northern part of the site (Figure 4) adjacent to Rowan Lane. It appears from the applicant's current proposals that they will not be interrupting this flow path / creating increased detriment from the current case however this can be confirmed by the applicant through additional 2d hydraulic modelling of the site and surrounding area. It should be noted that the applicant is not obligated to resolve this natural flow path that directs towards Westwells, just not increase flood risk as a result of the planned development.

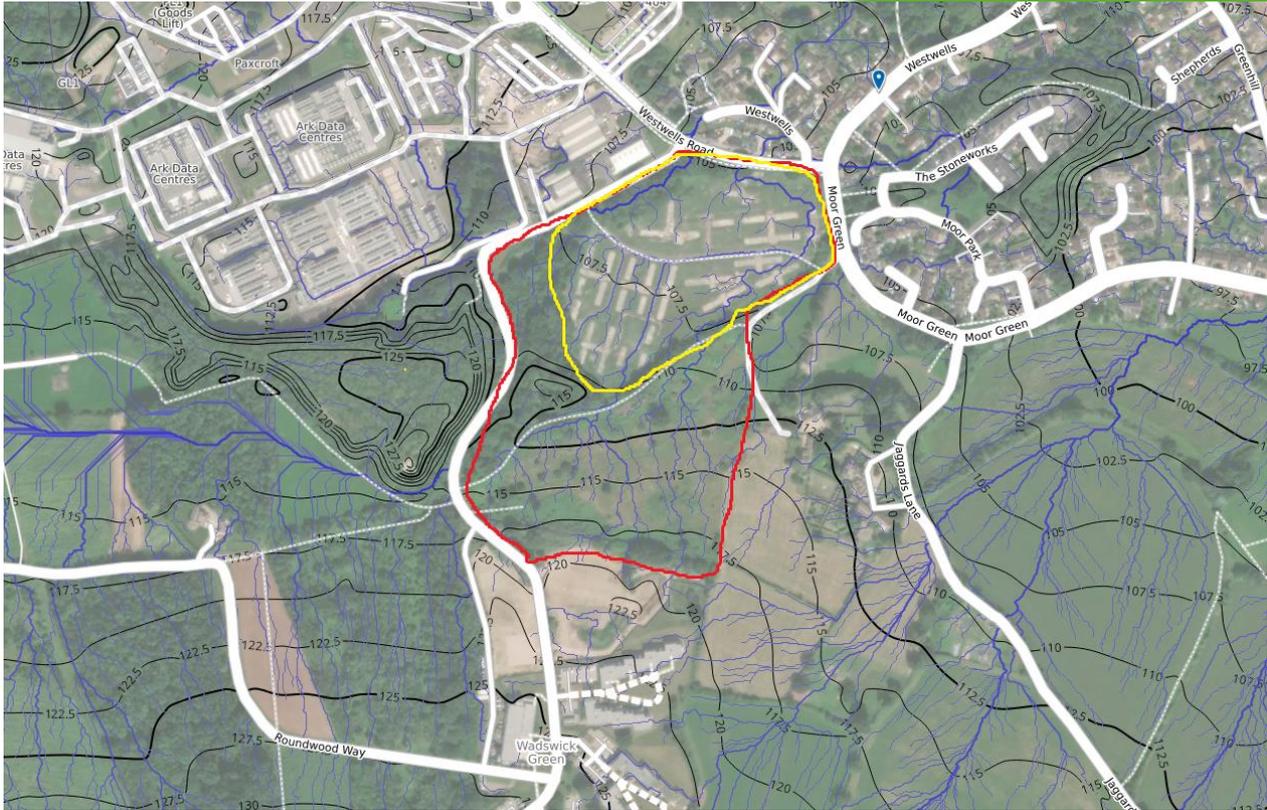


Figure 3: Natural overland flow paths with site indicated (red) and principle area of development within the site boundary (yellow)

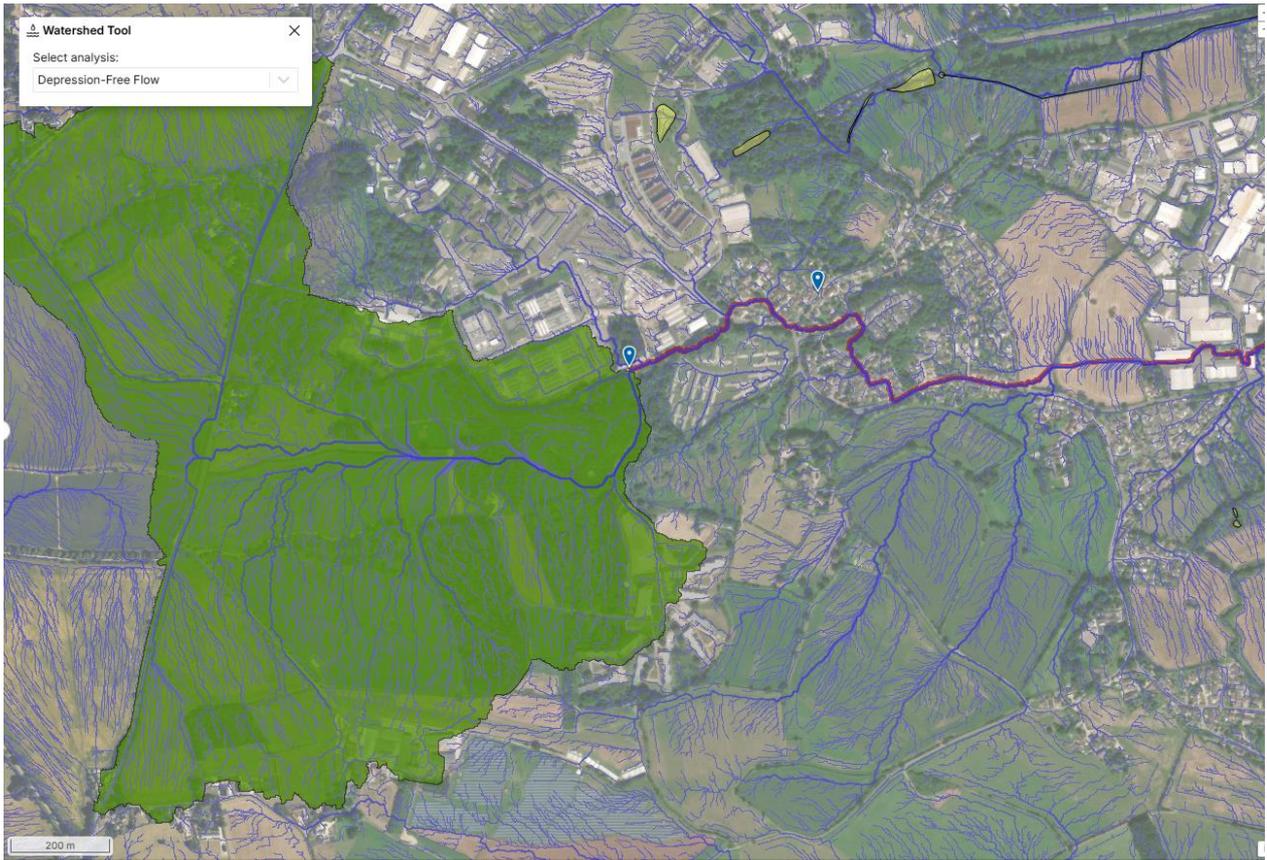


Figure 4: Natural flow paths of wider upstream catchment

With regards the proposed drainage strategy for the development, the applicant currently proposes a hybrid strategy comprising of significant rainwater harvesting and large soakaway features; this would comply with the control hierarchy within the National Standards for SuDS, and in the Sewerage Sector Guidance. Based on the high water demand for data-centres, rainwater harvesting is expected in order to reduce demand on potable water. It is noted that the applicant has not currently provided detailed drainage designs or quantified the water usage on site due to the M&E design of the data centre still being in abeyance. We would expect that detailed calculations on the rainwater harvesting system can be provided as a planning condition.

The applicant has proposed a drainage strategy currently which disposes of all surface water runoff via soakaway features; this demonstrates that regardless of the level of rainwater harvesting achieved, there is a viable drainage strategy for the site which aligns with the surface water disposal hierarchy. This has been based on initial soakaway tests and ground investigations undertaken in March 2023, and presented in document 24639-HYD-XX-XX-RP-GE-1002. This gives credibility to the proposed drainage strategy, although we note the following:

- Additional soakaway tests should be undertaken at the depth and location of the proposed soakaway features.
- Based on the variability of groundwater levels generally, long-term groundwater monitoring for a period of 1 year should be undertaken to determine the seasonal variability of groundwater levels on the site.

Some local residents have raised concerns on the downstream impact of infiltrated groundwater leading to infiltration into historic MoD underground structures, and a potential for an increased pump rate to receiving watercourses which could increase downstream flood risk within Westwells. On this point we would note:

- Any pumped discharge to ordinary watercourse is an activity regulated by Land Drainage Consents; if there is a proposed increase in rates, the MoD would be required to formally apply for this variation from the Lead Local Flood Authority and demonstrate that there is no increase in flood risk elsewhere as a result of the works.
- The MoD should be consulted on this planning application if they haven't already and asked to comment on the impact on their historic assets.
- As part of the detailed design (to be secured via condition) the applicant should complete a hydrogeological assessment to demonstrate that the proposed infiltration will not increase flood risk elsewhere.

We note that residents have raised concerns on the technical competence of the authors of the applicant's drainage submissions linked to professional qualifications. We will not comment on this point but note that if this of significant concern, the applicant could provide a statement from a professionally qualified and competent Civil Engineer endorsing the strategy provided.

We continue to support the application subject to additional information being obtained via condition. Condition 1 has been updated to directly reflect the points raised above.

Conditions:

1. The applicant must provide the detailed drainage strategy for approval by the Lead Local Flood Authority. This shall include (but shall not be limited to):
 - a. Details of the proposed rainwater harvesting system, including details of attenuation storage, water use, and response to both the design storm (1 in 100yr + cc), and long-term time-series rainfall across a year.
 - b. A detailed 1d-2d hydraulic model, considering the detailed drainage design and demonstrating that there will not be an increase in flood risk elsewhere as a result of the development.
 - c. Supplementary long-term ground investigations and supporting hydrogeological assessments.
 - d. Detailed cross and long section drawings, in addition to detailed calculation for each drainage feature, including the ground attenuation tank and detention basins.
 - e. The applicant must provide the raw infiltration test data for review by the LLFA and justify why the value 2 is an appropriate factor of safety for this application. The applicant is referred to the informatives for further guidance. The LLFA notes that the drainage strategy is largely reliant on infiltration, we require an explanation as to why a FoS of 2 is adequate when considering the size of the site & potential flood risk in the event of infiltration failure/issues.

- f. The applicant shall submit a plan showing overland exceedance routes for in excess of the 1 in 100 year plus climate change (40%) rainfall event, that minimise the risk to people and property. This shall include natural overland flow routes which originate off-site and enter within the red-line boundary of the development.
 - g. We note the applicant has provided a table outlining an approximate maintenance plan. At this stage of an application, the applicant is required to outline who will be responsible for undertaking maintenance, and a time frame to represent the frequency of maintenance (e.g. every 3 months) for each feature of the draining system, (including SuDS features). The current timescale provided does not provide the required detail and could lead to an insufficient maintenance regime.
2. On page 3 of the Drainage Strategy the applicant states “the site comprises brownfield land and as such, it is expected that surface water permeates into the ground until the saturation point of the soil is met”.
- The applicant must undertake geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design. The applicant must use these results to develop the detailed drainage plan, and agree this with the LLFA prior to commencing construction.
3. The applicant must provide a construction management plan which demonstrates how flood risk to people and property will be mitigated, and how pollution to groundwater and existing watercourses will be prevented.

Informatives:

- Within the calculations, the MADD factor must be set to zero and the margin for “flood risk” warning in hydraulic models been set to $\geq 300\text{mm}$.
- Table 25.2 from the SuDS Manual, criteria for applying an appropriate factor of safety:

TABLE 25.2 Suggested factors of safety, F, for use in hydraulic design of infiltration systems (designed using Bettess (1996). Note: not relevant for BRE method)

Size of area to be drained	Consequences of failure		
	No damage or inconvenience	Minor damage to external areas or inconvenience (eg surface water on car parking)	Damage to buildings or structures, or major inconvenience (eg flooding of roads)
< 100 m ²	1.5	2	10
100–1000 m ²	1.5	3	10
> 1000 m ²	1.5	5	10

- Wiltshire Council Soakaway Guidance: <https://www.wiltshire.gov.uk/media/208/Developers-Guidance-Notes-Surface-water-soakaways/pdf/Developers-guidance-note-surface-water-soakaways-2.pdf?m=637082203851900000>
- The detailed drainage design must comply with the National SuDS Standards published on 19 June 2025.

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Barney Taylor (AtkinsRéalis working on behalf of Wiltshire Council Drainage).