

**To: Development Management
Bridger**

From: Drainage Team Jed Ainsley-

Planning App Ref: PL/2025/07258

Service Ref:

Date: 31/10/2025

PROPOSAL

Variation of condition 2 (Approved Plans) of application 20/11097/FUL relating to site layout, lighting, ecological enhancement and lodge details.

SITE LOCATION

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	X
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- *20-11097-FUL Decision Notice*
- *Application Form*
- *Cover Letter*
- *Location Plan*
- *Masterplan*

RELEVANT PLANNING POLICY & GUIDANCE

National Planning Policy Framework (NPPF) [NPPF December 2024 Link](#)
Planning and Flood Risk (Paras 170–182)

Wiltshire Core Strategy – Adopted January 2015 [Wiltshire Core Strategy Link](#)
Core Policy 67 requires that all new development must address flood risk from all sources and not increase flood risk elsewhere. It supports the use of Sustainable Drainage Systems (SuDS) and requires that developments demonstrate how surface water will be managed sustainably.

Wiltshire Local Plan (emerging) [Local Plan Review Link](#)

Development must avoid high flood risk areas using the sequential approach. Proposals require a Flood Risk Assessment, Surface Water Drainage Strategy, and Groundwater Assessment where relevant. All schemes must include Sustainable Drainage Systems (SuDS), with major developments achieving a 20% reduction in runoff compared to greenfield rates, following the surface water discharge hierarchy.

Culverting and building over watercourses is discouraged, and natural drainage features should be retained or restored. Drainage strategies must ensure safety during extreme flood events (1-in-100-year + climate change) and provide safe access/egress. SuDS should also deliver biodiversity, amenity, and water quality benefits.

Supplementary Planning Documents

Wiltshire Council Drainage Betterment Strategy (2024) [SPD Link](#)

This technical guidance outlines expectations for surface water discharge hierarchy, attenuation, exceedance routes, water quality, and post-development monitoring.

Wiltshire Design Guide (March 2024) [SPD Link](#)

Includes principles of good design, including integration of SuDS and flood resilience.

Other Relevant Policies and Guidance

Planning Practice Guidance (PPG) – Flood Risk and Drainage [Guidance Link](#)

Covers detailed expectations for flood risk assessments, SuDS design, discharge hierarchy, sequential testing and climate change allowances.

Wiltshire SFRA (2024) [SFRA Link](#)

This document underpins the Sequential and Exception Test application and provides site screening evidence.

Section 19 Flood Investigation Reports

National Standards for Sustainable Drainage Systems (SuDS) June 2025 [Guidance Link](#)

Establishes mandatory criteria for runoff destination hierarchy, interception, flood resilience, water quality, amenity, biodiversity, and long-term maintenance for all new developments in England.

SuDS Manual (CIRIA C753)

This document sets out design principles, especially where attenuation, exceedance routing, and water quality are discussed.

Infiltration drainage design must be supported by ground investigations, including infiltration testing in accordance with *British Research Establishment*

(BRE) Digest 365 – Soakaway Design, and groundwater level monitoring that accounts for seasonal variation.

ASSESSMENT OF THE PROPOSAL

Context

In planning terms, flood risk refers to the potential for development to increase the likelihood or severity of flooding on-site or elsewhere, while drainage considerations relate to the capacity of the site and surrounding infrastructure to manage surface water runoff in a sustainable and effective manner.

The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

Assessment

The application is for a variation of approved plans to provide an additional 22 holiday lodges. These lodges are located in an area of flood zone 2 and 3. A flood risk assessment to suitably assess the risk to those additional lodges has not been submitted. It is noted the EA has also objected to this application on the grounds of an insufficient flood risk assessment.

It should also be noted that the existing conditions 10 and 12 are yet to be discharged. Upon receipt of the updated FRA to discharge the objection from the EA, further information to discharge drainage conditions 10 and 12 must also be submitted; with all those drainage documents having been revised to account for the additional plans.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

As the applicant is proposing on siting the additional 22 lodges within an area designated as flood zones 2 and 3, a further flood risk assessment must be provided to demonstrate this risk has been satisfactorily considered; with mitigating measures put in place where necessary.