

To:	Development Management	From:	Drainage Team (Aayushi Kochar)
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Planning App Ref:	PL/2025/08648
Service Ref:	Drainage
Date:	10/12/2025

PROPOSAL

Reserved Matters Application for appearance, landscaping, layout and scale for 55 Residential Dwellings following Outline Planning permission ref PL/2024/05435.

SITE LOCATION

Land North of Melksham Road, Holt

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Construction Environmental Management Plan*
- *Construction Management Statement*
- *Design & Access Statement*
- *Drainage Layout - Sheet 1 of 2*
- *Drainage Layout - Sheet 2 of 2*
- *Drainage Technical Note*
- *Exceedance Flow Plan*
- *Flood Risk Assessment and Drainage Strategy*
- *Site Location Plan*

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 has been supported with a Site-Specific Flood Risk Assessment (FRA) (submitted previously for *PL/2024/05435*). 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.

The site is located within SPZ1 and Flood Zone 1. The applicant proposes to discharge surface water to Chalfield Brook via an attenuation basin equipped with a Hydro-Brake flow control device.

The applicant has proposed a post-development discharge rate of 6 l/s. This would provide 20% betterment over the QBar rate of 7.6 l/s. However, this approach does not comply with Wiltshire Council's updated betterment policy, which requires a 30% reduction over existing greenfield rates. In addition, the applicant has applied betterment only to the QBar rate; while this provides betterment for higher return period storms, it does not provide betterment for the 1-in-1-year storm event. The applicant must ensure that discharge is restricted to 3.36l/s (providing 30% betterment to Q1 (4.8l/s) rates) to provide betterment across all storm events, including the 1-in-1-year event. The drainage strategy and calculations should be updated based on this requirement.

The applicant proposes to discharge surface water to Chalfield Brook via a ditch. Before this approach can be accepted, the applicant must provide evidence demonstrating how the surface water disposal hierarchy has been applied and confirm that all other options have been utilised to the maximum extent practicable, before moving down the hierarchy. In particular, the applicant must justify why rainwater harvesting and infiltration have not been implemented on site. Furthermore, the applicant must provide evidence of interception storage for the first 5 mm of rainfall, in accordance with Standard 2 of the National Standards for SuDS.

The previously submitted FRA highlights that existing Wessex Water mains cross the development site. The proposed layout respects the required clearances around these assets, however, the applicant must also confirm that protection arrangements for these mains have been agreed with Wessex Water, as previously requested.

RECOMMENDATION

No objection subject to the following conditions

1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

In order to discharge the above drainage condition the following additional information must be provided:

- The applicant must submit evidence demonstrating how the surface water disposal hierarchy has been applied and how each option has been utilised to the maximum extent practicable. The hierarchy is set out below:
 - a) Surface water runoff is collected for use.
 - b) Discharge into the ground via infiltration.
 - c) Discharge to a watercourse or other surface water body.
 - d) Discharge to surface water sewer or other drainage system, discharging to a watercourse or other surface water body.
 - e) Discharge to a combined sewer.
- The site is located in source protection zone 1 (SPZ1) for drinking water. This will have an impact on infiltration-based SuDS. The drainage strategy should address water quality issues and comply with the Environment Agency's approach to groundwater protection, which states that where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.
- The applicant must provide Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design to determine the feasibility of infiltration on site.
- It is noted that the applicant plans to restrict discharge rates from the site to the greenfield Qbar rate (corresponding to the 1 in 2.33year rainfall event) for all events up to the 1 in 100year + climate change storm; it is acknowledged that for the higher return period rainfall events this will provide betterment, however this will not provide the required level of betterment for lower return period events (such as the 1 in 1 year rainfall event). Wiltshire Council's updated betterment policy for greenfield sites states:

*"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide **30% betterment** over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."*

The applicant will be required to resubmit calculations which demonstrate that the required **30% betterment** against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events.

- The applicant must carry out a sensitivity analysis to assess the impact of a surcharged outfall on the proposed drainage system. This analysis should demonstrate that the system can operate effectively and safely under conditions where the receiving watercourse or sewer is at a high level or surcharged and identify any mitigation measures required.

- A detailed plan showing the cross sections and design of all proposed SuDS features, including attenuation ponds, conveyance systems, and infiltration components.
- The applicant must provide evidence of permissions to cross third party land and permissions from riparian owners to discharge to the watercourse/river in perpetuity. There is no automatic right to cross third party land or discharge to a watercourse/river not in ownership of the applicant.
- The applicant must provide a confirmation from Wessex Water that appropriate protection arrangements for the existing foul and potable water mains within the site have been agreed and will be implemented in accordance with Wessex Water's standards.

2. No development hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details.

In order to discharge the above drainage condition the following additional information must be provided:

- Clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

INFORMATIVES

Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

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 30% 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 [Section 19 Reports Link](#)
These documents summarise investigations into significant local flood incidents and establish what caused the flooding, how authorities responded, and actions needed to prevent future floods.

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 set outs 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.