

To:	Hilary Quixley	From:	Drainage team (Megan Macpherson)
------------	----------------	--------------	----------------------------------

Planning App Ref:	PL 2025 09124
Service Ref:	Drainage
Date:	15/12/2025

PROPOSAL

Full planning permission (retrospective)

Raise ground levels to east of land to prevent flooding

SITE LOCATION

Land East of Dudgemoor Farm, Hayes Knoll, Purton Stoke, SN5 4JJ

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

Redacted Application form

Existing and Proposed Site Plans

Sections

Proposed Finished Levels & Section

Neighbour Map

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.

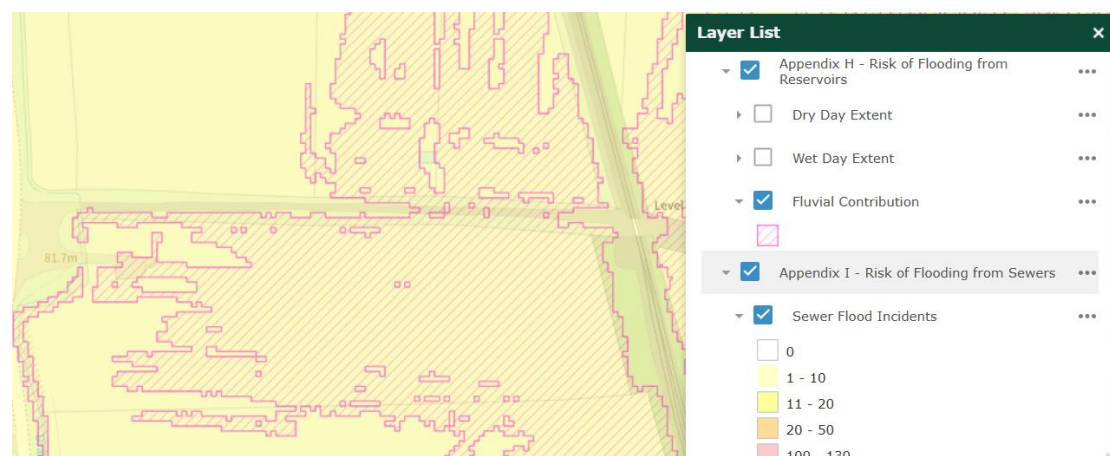
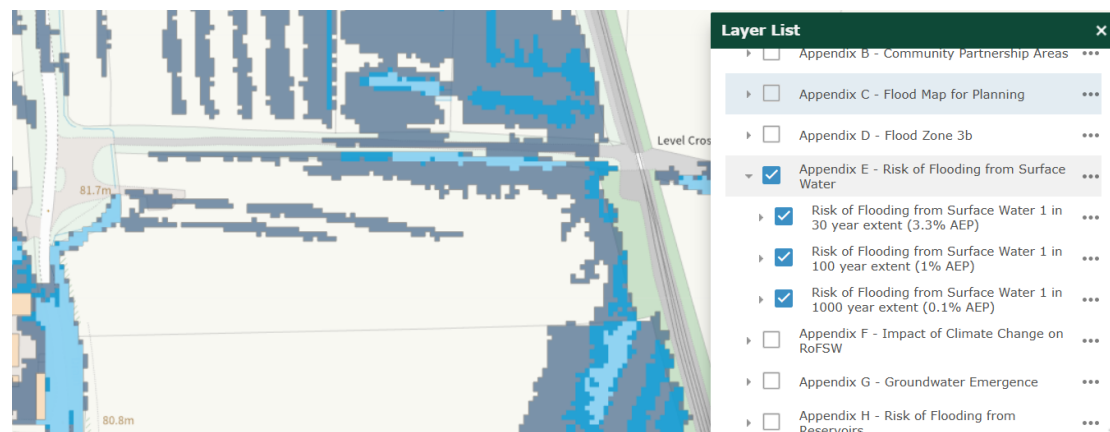
The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

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 applicant has submitted plans to raise ground levels across the eastern portion of the site. A new building is also proposed within this area, but it is understood that this building does not form part of this planning application.

The area where ground level raising is proposed is subject to surface water flood risk. The SFRA mapping indicates that this is minimal up to the 1 in 100 year storm event but does increase across the site during the 1 in 1000 year storm event. The SFRA mapping shows the site to be at risk of reservoir and sewer flooding. This can be seen in the extracts below.



The LLFA's concern is that raising ground levels within this area would displace existing flood volumes that accumulate here, and that no plans have been submitted to demonstrate that

compensation storage will be provided elsewhere on the site to ensure that these flood volumes are still safely managed.

We would expect the applicant to submit plans that demonstrate that compensation storage is provided elsewhere on the site, to ensure that adjacent land and/or infrastructure is not adversely affected by displaced flood volumes. It would also be useful if the applicant provided some commentary to explain the proposals for the new building and their concerns regarding existing flooding issues on the site.

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:

- Commentary regarding the applicant's experience of flooding on the site, the plans for the new building, and the driver for the proposed ground raising.
- A plan demonstrating that flood compensation storage is provided elsewhere on site, to ensure no increase in flood risk to adjacent land and/or infrastructure.

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.