

To:	Drainage	From:	James Playfair
------------	----------	--------------	----------------

Planning App Ref:	PL/2025/03672
Service Ref:	Drainage
Date:	5 th January 2026

PROPOSAL

Full Planning Application For Residential Development To Provide 55 Dwellings, Public Open Space, Access, Drainage, Landscaping, Associated Infrastructure And Ancillary Works

SITE LOCATION

Land East of Biddestone Lane, Yatton Keynell

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- Flood Risk Assessment and Drainage Strategy

ASSESSMENT OF THE PROPOSAL

Context

In May 2025, the LLFA requested that the applicant address the following points:

1. The drainage team have conducted a calculation for the greenfield runoff rate for the proposed site. Said calculation returns a figure lower than that of the calculation carried out by the applicant; which would result in changes to the drainage strategy and size of attenuation needed on site (calculation carried out by the drainage team attached as a separate PDF document). This is due to a discrepancy between the soil class and SAAR values applied within each of the calculations. The applicant should then provide evidence to justify those values being appropriate for the site in question.
2. 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.
3. Wherever possible the applicant should seek to provide additional blue-green SuDS features throughout the development in order to provide increased climate resilience, and a drainage system with multi-faceted benefits. The use of source control features throughout the development may help reduce the size of a single site-wide attenuation system.
4. No development shall commence on site until the applicant has undertaken a sensitivity analysis on the network considering surcharged outfall conditions.
5. As the proposed attenuation basin will be located in an area of surface water flood risk, supplementary modelling evidence to demonstrate the basin has capacity to accept both flows from the development and surface water flood extents without being inundated should be produced for review by the LLFA.
6. The applicant must provide hydraulic modelling to demonstrate the effectiveness of the proposed flood compensation measures; evidencing that sufficient compensation is achieved to ensure no elevated flood risk downstream of the development.
7. Overland exceedance routes should be demonstrated on the drainage plan for flows in excess of the 1 in 100 year plus climate change (45%) rainfall event.
8. As the applicant has represented flood zones/extents based on their own calculations, evidence of drawings and any supplementary modelling should be provided for review to demonstrate flood risk is accurately represented.
9. Further assessment of the downstream connectivity of the proposed ditch to which the development will outfall, and the mechanism by which water then drains from this ditch should be conducted to ensure the suitability and function of said ditch to safely receive flows from the proposed development.

Assessment

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.

1. Greenfield calcs have been revised in the latest FRA. Section 3.14 states: *'Values are obtained from the FEH Web Service provided by the UK Centre for Ecology and Hydrology. Since the original design was undertaken, SAAR6190 has been replaced by SAAR9120 which suggests a value of 879mm. However, the original design has been kept to provide a betterment over the new run-off rates. This is acceptable.*
2. A 30% betterment has been included in the drainage strategy and has been accepted.
3. A swale and an attenuation pond have been included in the SW drainage design which meets the requirement for a multifaceted approach to SUDS.
4. Appendix D of the DS includes calcs that relate to surcharged outfall conditions and has been accepted.
5. Flood zone compensation has been accounted for: *"This compensation area will have an approximate volume of 4270m³ which allows for the required 660m³ from the attenuation pond, plus an extra 3610m³ of flood storage".* This is acceptable.
6. Section 6.2 refers to compensation but calcs have not been supplied to support the values presented. **These are still required.**
7. Flood exceedance routes have been shown on the Drainage Strategy Plan which show flows entering Biddestone Lane to the north. This does not present a risk to people or property.
8. We are satisfied that the representations of the flood zones is accurate and no further information is needed on this.
9. Section 4.8 states: *"Flows have been observed discharging to the ground at the western end of the ditch. Where the water resurfaces once it discharges to the ground is currently undetermined, but the wider catchment drains to the west away from the site. Anecdotal evidence suggests that the outfall becomes overwhelmed in extreme events causing water to build up and pond in the southwestern corner of the site. Based on the levels shown on the survey the water will rise until it gets to an approximate level 121.95m AOD when it will overtop the low point of Biddestone Lane and flow overland to the west'.*

The betterment achieved combined with the storage compensation should serve to lessen any impact on Biddestone Lane from exceedance flows.

RECOMMENDATION

No objection subject to the following conditions

- Calculations relating to the storage compensation are still required (as per point 6 above)

INFORMATIVES

[include any additional information relevant or helpful to the applicant, that does not need to be covered by objections and/or conditions]

Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

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 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.