

To:	Isobella Wise	From:	Drainage Team – Abhishek Nandan
------------	---------------	--------------	---------------------------------

Planning App Ref:	PL/2025/08987
Service Ref:	Drainage
Date:	07 January 2026

PROPOSAL

Outline planning application with all matters reserved except for access for the erection of 2 No. self-build plots and associated works.

SITE LOCATION

Land at First Lane, Whitley, SN12 8RL

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

- Application Form
- Flood Risk Assessment
- Illustrative Master Plan
- Location Plan
- Parameter Plan
- Planning, Design and Access Statement

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). 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 application proposals are in outline and comprise 2 no. self-building detached residential properties with parking areas.

The proposed development manages surface water through combined collection, storage, and controlled discharge. Rainwater from roofs, driveways, and roads is first captured at source, with rainwater butts provided for reuse.

Permeable paving is used for roads and driveways, allowing water to infiltrate and store within a tanked sub-base, providing approximately 100 m³ of attenuation across two zones. Flow is controlled using orifice plates to restrict discharge to 0.5 l/s; it is noted that this is an increase in discharge rate when compared to the calculated greenfield rates and would broadly correspond with a Q10 event currently.

The applicant states this is due to managing blockage risk but still proposed 18mm diameter orifices which based on guidance within the SuDS Manual would be at blockage risk still. No assessment has been carried out on the impact of the increased discharge rate or the potential blockage risk of the proposed orifice plates.

The applicant discusses within section 3.3.9 of the submitted Flood Risk Assessment the potential need to line features due to groundwater ingress but has not submitted details of groundwater levels on site; this could have a significant impact on the drainage strategy and should be understood at this stage.

The applicant mentions the need for interception storage to be provided on site in accordance with Standard 2 of the National SuDS Standards, however has not detailed how this will be provided. It is assumed based on the submitted strategy that permeable paving would be used to provide this, although this cannot be relied upon if the permeable paving were to be lined (as implied by the above point). Winter groundwater monitoring should be completed to help determine the drainage strategy for the site and to ensure that interception storage as per National SuDS Standards can be provided.

A swale on the western side is proposed to intercept overland flows and conveys water to the existing on-site ditch, which then discharges into South Brook, a natural watercourse. No modelling has been provided in order to demonstrate the impact this feature will have on pluvial flood risk. The submitted drainage plans also show the proposed permeable paving and dwellings to be constructed in an area of pluvial flood risk; although it's implied that the swale

will reduce this, formal evidence has not been provided. We are therefore concerned that the applicant has not fully demonstrated how pluvial flood risk will be managed.

The applicant has proposed new gullies within the adjacent highway to collect and convey flows; again, this has been proposed without supporting pluvial modelling and therefore the impact on local flood risk is unknown currently.

The road to the north of the site has previously flooded, and therefore in line with Paragraph 047 of the PPG, the applicant should demonstrate how safe access and egress during the design storm is maintained.

RECOMMENDATION

Based on the information submitted, and local flood risk within Whitley, we would recommend a **holding objection** so as the applicant can provide updated information to cover the following points:

- i. Demonstration of how the proposals will manage pluvial flood risk supported by appropriate 2d modelling
- ii. Overland exceedance routes (as per National SuDS Standard 3) which demonstrate how exceedance flows will be safely managed to prevent an increase in risk to people or property.
- iii. Demonstration that the peak winter groundwater levels are understood and incorporated into the drainage design
- iv. A drainage strategy which demonstrates how greenfield runoff and volumes will not be increased by the proposed works, provides the required interception storage (in accordance with National SuDS Standards)
- v. Demonstration that safe access and egress to the site can be achieved during the design storm in line with PPG.

We would encourage the applicant to proactively engage the Parish Council in order that local concerns (and supporting evidence of historic flooding) can be fully understood and incorporated into the proposals.

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.

- 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 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.