

To:	Hilary Quixley	From:	James Playfair
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Planning App Ref:	PL/2026/00086
Service Ref:	Drainage
Date:	15 January 2026

PROPOSAL

Full

Conversion of stable block to 'Granny' annex and widening of entrance gate.

SITE LOCATION

1 The Derry, Ashton Keynes, Swindon, SN6 6PW

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

Proposed Block Plan
Flood Risk Assessment

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 applicant has not provided any drainage information at this stage; we would advise the applicant to submit a concept drainage plan at this stage so as we can provide direction ahead of subsequent planning stages.

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:

- Evidence that the [surface water disposal hierarchy](#) has been applied.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Soakaway testing in accordance with BRE365, and groundwater level monitoring (taking into account seasonal variations).
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Existing pre and post development runoff rates for the site, in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- Evidence that the proposed drainage design provides a sufficient level of water treatment.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.
- If access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](#)

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.

To aid in the development of compliant drainage strategies, the following are recommended without prejudice. These are based on the [National Standards for SuDS](#). We would recommend also utilising the best practice guidance within *The SuDS Manual*, and *Getting SuDS Right from the Start*:

Standard	Best Practice Considerations
Standard 1 – Drainage Hierarchy	• Retain and enhance existing natural drainage features where possible. • Use site layout to maximize opportunities for infiltration and above-ground conveyance. • Identify how communal rainwater harvesting can be utilised to help improve viability of inclusion. • Identify whole-life cost-benefits such as water bill reductions for implementing rainwater harvesting.
Standard 2: Interception	• Use green roofs, permeable paving, rain gardens, and bioretention to maximize interception. • Distribute source control features throughout the site for maximum effectiveness. • Provide a maintenance plan to ensure interception features remain effective.
Standard 3: Management of Extreme Rainfall and Flooding	• Use topographical surveys to identify and preserve natural overland flow routes. • Design SuDS features with freeboard and overflow routes. • Ensure safe access and egress during extreme events. • Consider overland flows originating from outside redline boundary • Consider how the drainage systems will perform in the event of blockage and failure
Standard 4: Water Quality	• Use vegetated SuDS (swales, ponds, wetlands) for effective pollutant removal. • Include forebays or sediment traps upstream of main SuDS features. • Provide a maintenance plan for regular removal of silt and debris.
Standard 5: Amenity	• Use gentle side slopes, accessible paths, and seating to make SuDS features usable and attractive. • Involve local communities in the design of SuDS spaces.
Standard 6: Biodiversity	• Design SuDS to create wetland mosaics, wildlife corridors, and habitat connectivity. • Consider how SuDS can help provide wider BNG benefits / credits to the site
Standard 7: Construction, Operation, Maintenance, Decommissioning, and Structural Integrity	• Plan for safe access for maintenance. • Include decommissioning plans for temporary features.

The table below stipulates the information typically required at each application stage. Provision of the correct information will expedite the processing of applications by the drainage team.

Pre-app	Outline	Full	Reserved matters	Discharge of conditions	Document to be submitted
✓	✓	✓			Flood Risk Assessment / Statement
✓	✓	✓			Drainage Strategy / Statement & sketch layout plan
	✓				Preliminary "Outline" hydraulic calculations
	✓	✓			Ground investigation report (for infiltration)
	✓	✓	✓	✓	Evidence of third party agreement for discharge to their system (consent to discharge)
		✓		✓	Maintenance program and on-going maintenance responsibilities
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters
		✓	✓	✓	Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change

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.

