

To:	Oliver Phippen	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2025/09484
Service Ref:	Drainage
Date:	12/01/2025

PROPOSAL

Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure.

SITE LOCATION

Land North of Swindon Road, Royal Wootton Bassett

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*
- *Covering Letter*
- *Flood Risk Assessment and Drainage Strategy*
- *Geo-Environmental Site Investigation Report*
- *Parameter Plan – Land Use*
- *Planning 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

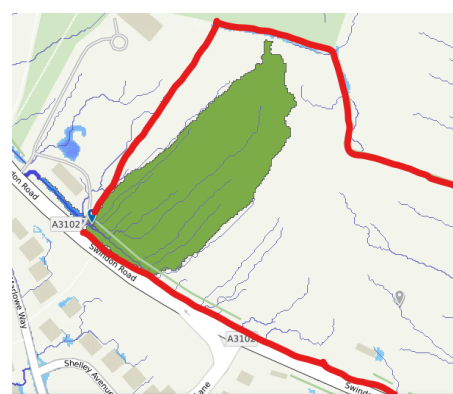
The application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

It is noted the applicant has provided a geo-environmental site investigation report that has concluded surface water disposal is not feasible at the site. The applicant has demonstrated adherence to the surface water disposal hierarchy as the method of disposal proposed is discharging surface water flows to an existing ditch in the east of the site, attenuating flows in SuDS across the site.

It should be noted that the LLFA support the proposals to install several SuDS features across the development in adherence to Standard 4, 5 & 6 of the National Standards for SuDS. The LLFA is open to discussing what further information is required at a more detailed stage of this application with the applicant in the future.

However, the applicant has not provided sufficient details to demonstrate that overland flow will be safely managed, and will not increase flood risk downstream. The LLFA is concerned that overland flow from the western catchment (including the green area, right image) of the existing greenfield appears to flow towards the area of existing modelled surface water flooding on the highway (1 in 30yr event).

At this stage of the application & to remove the holding objection, the applicant must address this concern & outline how overland flow will be prevented from flowing off the southern boundary of the development and onto the highway.



RECOMMENDATION:**Holding objection:**

- 1. The applicant must provide further information related to the surface water drainage strategy:**
 - Observing figure 3.5 of the FRA, the applicant must outline how overland exceedance flows will be prevented from running onto the highway, across the southern boundary. The LLFA is concerned that there is modelled surface water flooding in the 1 in 30 year event on the highway, and the applicant has not demonstrated that overland flow from the development site will not contribute to surface water flooding in this area.
 - It is noted the applicant has provided the greenfield runoff rates with 30% betterment applied in section 6.6.2 of the FRA. For clarity, the applicant must demonstrate with a simple table that 30% betterment has been achieved on each storm event (1 in 1, 30 and 100+cc event) in line with Wiltshire Council's betterment policy.
 - Calculations to demonstrate that runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features (excluding attenuation ponds), in accordance with Standard 2 of the National Standards for SuDS.
 - To demonstrate adherence to Standard 7 of the National Standards for SuDS, the applicant is required to provide a clearly labelled drainage layout plan showing the pipe network and proposed SuDS features. The plan should show any pipe node numbers referred to within the drainage calculations.
 - To demonstrate adherence to Standard 3 of the National Standards for SuDS, the applicant is required to provide the hydraulic model, for each storm event, ensuring there is no modelled flooding in any storm event up to the 1 in 100 year event.
 - Detailed cross and long section drawings, and calculations, to demonstrate SuDS features (including the swale and attenuation basin) are designed appropriately.
 - Evidence to demonstrate there is no catchment transfer by discharging flows to the eastern watercourse. The applicant is required to demonstrate there is no increase to flood risk downstream as a result 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.*

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](#).

- *The applicant should note at a more detailed stage of the application, the drainage team will request further details regarding who is responsible for undertaking maintenance of the drainage network.*
- *If any features of the drainage network (including SuDS), are to be the responsibility of individual plot owners, the applicant must include the drainage strategy (including detailed drawings) & maintenance regime in the title deeds of the property.*
- *It is noted in section 6.10.8 that a detailed construction management plan will be provided at a more detailed stage of the application. The applicant must ensure the CMP demonstrates how surface water will be safely managed, mitigating flood risk to people & property. In addition, the applicant will be required to demonstrate how pollution to groundwater & watercourses will be mitigated throughout construction.*
- *It's noted there are two proposed alternative foul water strategies. The applicant must agree a strategy with Wessex Water as the foul sewerage undertaker for the region.*
- *It is noted in section 5.11.5 of the FRA the applicant has stated a sequential approach has been applied to the development. The LLFA would recommend the applicant completes a sequential test to clearly demonstrate the sequential approach has been applied to the council & local communities.*
- *Hydraulic Models should set the MADD factor / additional storage volume factor to 0m³ / ha in order to prevent an overestimation of storage capacity in the proposed drainage network. If a value other than 0m³/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.*

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.