

To:	Gen Collins	From:	James Playfair
------------	--------------------	--------------	----------------

Planning App Ref:	PL/2025/09736
Service Ref:	Drainage
Date:	3 rd February 2026

PROPOSAL

Outline planning permission: Some matters reserved

Outline planning application for up to 48 dwellings, a village shop (use class F2(a)) and associated green infrastructure (all matters reserved other than access).

SITE LOCATION

Land Lying west of Semington Turnpike, Semington

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

- Flood Risk Assessment
- Drainage Management Strategy

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 Wiltshire Council Strategic Flood Risk Assessment, Risk of Flooding from Rivers and the Sea (RoFRS) 2025, has indicated that the site is located within Flood Zone 1 and there has a low level of risk from fluvial flooding.

The site has, in places, a medium to high level of risk from surface water flooding.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#). The site has a medium level of risk from ground water flooding.

An intra-site sequential approach has been taken, and the proposed residential development avoids medium and high chance of surface water flooding areas where practical. Where residential development is required within these higher likelihood locations, it has been determined that these high chance areas are essentially localised low-spots onsite and as the catchments originate onsite, this risk can be adequately mitigated. Mitigation in the form of both appropriate levels design and implementation of formal surface water drainage infrastructure will be proposed.

There are three methods that have been reviewed for the management and discharge of surface water, these may be applied individually or collectively and should be applied in the order of priority as follows:

- 1. Discharge via infiltration;*
- 2. Discharge to watercourse; and*
- 3. Discharge to public sewer.*

It is proposed that a combination of infiltration-based features be utilised to serve the site including an infiltration basin serving the wider scheme but also plot level infiltration in the form of bio-filtration, permeable surfacing, raingardens and domestic soakaways (subject to design parameters and engineering constraints). Soakaway Testing (to BRE365) should be undertaken in due course to inform the detailed drainage design works by confirming onsite infiltration rates.

In relation to the FRA:

1. In paragraph 1.1.6 of the submitted FRA the applicant indicates that further assessment of overland flow routes through the development will be required in order

- to demonstrate the development will not increase flood risk elsewhere. This has not been provided currently
2. The applicant's FRA indicates that significant portions of the site are at risk of pluvial flooding. The LLFA would encourage the LPA to consider on this basis, whether a sequential test to demonstrate how other sites at lower risk of flooding are reasonably available for development in line with NPPF. As this is a planning matter only, we will not speculate on whether the site passes the Sequential Test. The applicant themselves have identified the need for a Sequential Test to be completed in paragraph 6.1 of the submitted FRA
 3. The applicant states that the LLFA have confirmed through correspondence in Appendix D that there are no records of historic flooding; this is incorrect - the correspondence in Appendix D states that the LLFA cannot provide such information outside of the formal pre-application process.

In relation to the Drainage Management Strategy:

4. The applicant assumes that 55% of the area of the site will become impermeable as a result of the proposed development (a total area of 1.138ha) but is calculating runoff based on a 1.75ha area. As permeable areas are often discounted from the hydraulic models (due to them not having formal drainage) we require the applicant to either use a rate of 1.138ha for the calculation of discharge rate or demonstrate that the permeable areas of the site are included within hydraulic modelling. Given that the applicant is currently proposing to discharge of surface water via infiltration, this is likely to not be a significant issue.
5. We note that the impermeable areas are an estimate at this stage and therefore these will need to be refined as part of the development of the detailed site proposals.
6. The applicant currently has not undertaken soakaway testing in accordance with BRE365, and therefore the indicative size of infiltration basin cannot be relied upon. As this may result in significant changes to the overall development layout, and potential financial viability for the developer, these tests should be completed and used to iterate the current drainage management strategy.
7. On paragraph 4.7.1 it is stated that there is an existing highways drain within Turnpike Close which could be a viable alternative; this statement is false. It cannot be assumed that the council will accept the additional discharge into the highways drain. In order to confirm this as a viable solution, the council would require full CCTV survey of the highways drain from point of connection to outfall, and supporting hydraulic modelling of the network in order to demonstrate that there would be no detriment. Without this information it cannot be assumed that an outfall to the highways drainage system is viable.
8. In Appendix K the applicant states that "The information reviewed is not exhaustive and has been accepted in good faith as providing representative and true data pertaining to site conditions" - this statement implies to the LLFA that the applicant is not certain of their strategy or fully understand the site conditions. We would therefore have to object to the application at this stage.

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:

Applicable to the entire proposal

- The applicant's FRA indicates that significant portions of the site are at risk of pluvial flooding. The LLFA would encourage the LPA to consider on this basis, whether a sequential test to demonstrate how other sites at lower risk of flooding are reasonably available for development in line with NPPF. As this is a planning matter only, we will not speculate on whether the site passes the Sequential Test. The applicant themselves have identified the need for a Sequential Test to be completed in paragraph 6.1 of the submitted FRA.
- The applicant states that the LLFA have confirmed through correspondence in Appendix D that there are no records of historic flooding; this is incorrect - the correspondence in Appendix D states that the LLFA cannot provide such information outside of the formal pre-application process.

Specific requirements aligned to the National Standard for SuDS

Standard 1: runoff destinations

- Post development runoff rates. These must also be in accordance with Wiltshire Council's 30% betterment policy update, which can be found [here](#).
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- 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.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant - In paragraph 4.7.1 it is stated that there is an existing highways drain within Turnpike Close which could be a viable alternative; this statement is false. It cannot be assumed that the council will accept the additional discharge into the highways drain. In order to confirm this as a viable solution, the council would require full CCTV survey of the highways drain from point of connection to outfall, and supporting hydraulic modelling of the network in order to demonstrate that there would be no detriment. Without this information it cannot be assumed that an outfall to the highways drainage system is viable

Standard 2: interception

- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- SuDS source control measures to manage water quantity and maintain water quality will be implemented wherever possible, and throughout the management train, so the development is not reliant upon large attenuation features close to the points of discharge.
- A schedule and plan of interception features must be provided, showing their location, type, and contributing catchment.

Standard 3: management of extreme rainfall and flooding

- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- The drainage strategy does not increase flood risk as a result of catchment transfer. In paragraph 1.1.6 of the submitted FRA the applicant indicates that further assessment of overland flow routes through the development will be required in order to demonstrate the development will not increase flood risk elsewhere. This is required

- All proposed drainage features are outside flood zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event. Furthermore, the applicant assumes that 55% of the area of the site will become impermeable as a result of the proposed development (a total area of 1.138ha) but is calculating runoff based on a 1.75ha area. As permeable areas are often discounted from the hydraulic models (due to them not having formal drainage) we require the applicant to either use a rate of 1.138ha for the calculation of discharge rate or demonstrate that the permeable areas of the site are included within hydraulic modelling. Given that the applicant is currently proposing to discharge of surface water via infiltration, this is likely to not be a significant issue.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.
- 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 the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.
- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753)

Standard 4: water quality

- The applicant must provide a pollution hazard assessment for all areas draining to SuDS features and demonstrate that the proposed treatment train achieves the required pollution mitigation indices for suspended solids, metals, and hydrocarbons, using the Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3).
- At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs).
- Calculations and supporting plans must be submitted to evidence compliance.
- A maintenance plan must be provided to ensure the long-term effectiveness of water quality treatment.

Standard 5: amenity

- The applicant must provide details of how SuDS features will deliver amenity benefits, including integration with public open space, accessibility, safety, and opportunities for recreation or education. Plans should clearly show how SuDS contribute to the quality and usability of the site for future occupants and the wider community. Note this may require additional engagement with the council's urban design and landscape officers.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks. A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- A plan showing the cross sections and design of any attenuation pond and its components.
- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design. The applicant currently has not undertaken soakaway testing in accordance with BRE365, and therefore the indicative size of infiltration basin cannot be relied upon. As this may result in significant changes to the overall development layout, and potential financial viability for the developer, these tests should be completed and used to iterate the current drainage management strategy.

- Groundwater level monitoring (taking into account seasonal variations).
- The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- 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](#).

In Appendix K the applicant states that "The information reviewed is not exhaustive and has been accepted in good faith as providing representative and true data pertaining to site conditions" - this statement implies to the LLFA that the applicant is not certain of their strategy or fully understand the site conditions. We would therefore have to object to the application at this stage.

INFORMATIVES

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 sets 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.