

To:	Oliver Phippen	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2025/09825
Service Ref:	Drainage
Date:	02/02/2026

PROPOSAL

Outline planning application (with all matters reserved except means of access from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of a new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.

SITE LOCATION

Land at Gate Farm, High Street, Sutton Benger

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 for Outline Application*
- *Desk-Based Archaeology Assessment*
- *Drainage Strategy*
- *Flood Risk Assessment (With Appendices) – Para 1 & 2*
- *Illustrative Site Layout Masterplan*
- *Phase 1 Geo-Environmental Desk Study – Part 1 & 2*
- *Planning Statement*
- *Site Access – General Arrangement Plan*

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 LLFA has noted several comments on the portal regarding flood risk and drainage from adjacent residents. The LLFA would strongly recommend that the applicant engages with these concerns, and provides a response to demonstrate how flood risk is being safely managed, without increasing flood risk to people and property.

The LLFA has recommended a holding objection at this stage as further information is required to demonstrate that infiltration is a feasible means of surface water disposal. Additionally, in line with the National Standards for SuDS: Standard 2: management of everyday rainfall (interception), further source control SuDS should be proposed across the extents of the site. This information is required at this stage to ensure the site layout plan can be fixed. The applicant should note the LLFA broadly approves of the proposed drainage strategy, particularly via infiltration, however more information is required at this stage.

It's also noted the applicant has stated a sequential test is not required. We would recommend the applicant completes a sequential test to avoid any potential challenges during the planning process.

RECOMMENDATION: holding objection as further information required

At this stage, the information is required to ensure the site layout plan can be fixed, prior to the application progressing beyond the outline stage of design:

1. It is noted in Section 3.5.3 of the FRA the applicant has adopted an infiltration rate of 1.47×10^{-5} m/s, this produced from infiltration testing attached within the appendices of the FRA.

While the LLFA has no objection to the proposed infiltration-led strategy, the infiltration testing provided has not been completed in adherence with BRE365. The applicant must complete 3x tests at each trial pit, and complete testing across the extents of the site in adherence with the National Standards for SuDS, Standard 3: management of extreme rainfall and flooding, paragraph 3.14 (footnote 16).

2. It is noted in Section 3.5.2 of the FRA that during the preliminary testing, groundwater was encountered at approximately 2.0mbgl.

The applicant must undertake groundwater testing to demonstrate a minimum of 1m clearance between the base of the infiltration basin and groundwater, in accordance with National Standards for SuDS, Standard 1: runoff destinations, paragraph 1.15.

3. The applicant must propose SuDS source control measures to manage water quantity and maintain water quality wherever possible, and throughout the management train, so the development is not reliant upon the basin.

While noting the applicant has stated in Section 4.4.3 of the FRA that permeable paving, filter drains or on-plot features remain under consideration and will be developed further at detailed design stage, this information should be considered at this stage of application.

The applicant should consider proposing raingardens, swales or other source control SuDS features which could increase the diversity of amenity and biodiversity across the extent of the site, while applying a 'SuDS approach' to demonstrate that at least the first 5mm of rainfall for the majority of rainfall events does not result in runoff from the site to surface waters or piped drainage systems – as required by National Standards for SuDS: Standard 2: management of everyday rainfall (interception).

In the event the applicant provides this information, the following points can be handled via condition, and dealt with at a more detailed stage of application:

- The applicant must ensure an appropriate Factor of Safety is applied in design. Currently a factor of 2 is proposed. Noting the drainage strategy is reliant on infiltration in one location, the LLFA would expect a factor of 10, in line with National Standards for SuDS, Standard 3: management of extreme rainfall and flooding, paragraph 3.17, Table S3.1 (footnote 13).
- In accordance with Standard 3 of the National Standards for SuDS, overland exceedance routes are to be identified and shown on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate there is no increase in flood risk to people or property.
- It is noted in Section 4.6.4 of the FRA that the water quality mitigations proposed are not sufficient to adequately treat the hazards outlined in Section 4.6.3. While further source control SuDS would likely provide sufficient mitigation, the applicant should note this information will be required to comply with the National Standards for SuDS, Standard 4: water quality paragraph 4.2.

- We note in Section 4.7 the applicant discussed how the proposed drainage strategy provides amenity value. The LLFA would refer the applicant to Point 3 of the holding objection, and the National Standards for SuDS, Standard 5: amenity as further amenity value could be provided across the extent of the site with additional source control SuDS features proposed.
- We note that in Section 6 of the FRA the applicant has provided a brief maintenance plan. At detailed design, the applicant must ensure this maintenance regime is detailed, and outlines who is responsible for completing maintenance. Additionally, if a landowner will be responsible for any maintenance, the maintenance regime and drainage strategy must be included in the title deeds of the property. (National Standards for SuDS: Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity).
- The applicant is required to provide a construction management plan that demonstrates how flood risk to people & property, and pollution to groundwater & adjacent watercourses will be mitigated throughout construction. (National Standards for SuDS: Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity).

INFORMATIVES

The applicant must gain an agreement from the sewerage undertaker for the region for an agreed discharge rate into the foul sewer.

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.