

To:	Samantha Stockley	From:	Drainage Team
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Planning App Ref:	PL/2026/00433
Service Ref:	Drainage
Date:	19/03/2026

PROPOSAL

Change of use of Paddock 1 from touring pitches (occupied by touring caravans or motor homes) and caravan storage to Padel Tennis Facility comprising the erection of a barn structure to accommodate 4no Padel courts and ancillary cafe, reception and seating area

SITE LOCATION

Blacklands Lakes Ltd, Knights Marsh Farm, Stockley, Calne, SN11 0NQ

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	x
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Planning Statement
- Site location plan
- Existing site plan
- Proposed site plan
- Paddle court plan and floor plan
- Barn elevation

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.

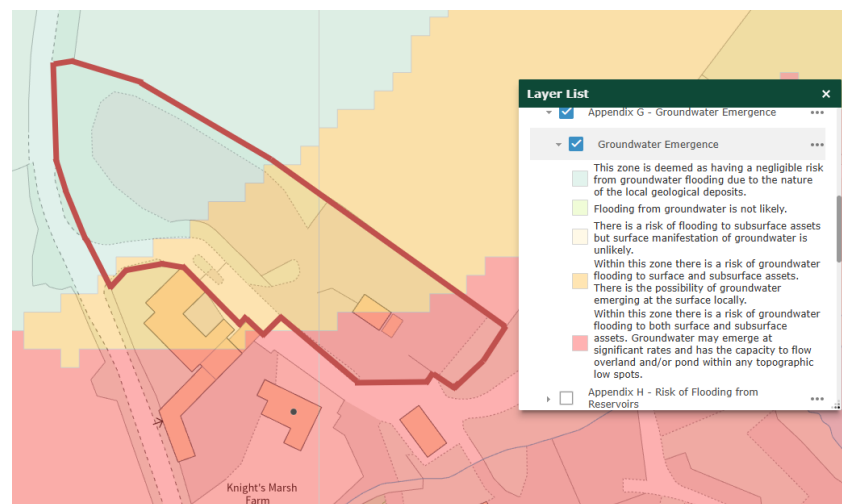
Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

Assessment

Our comments below are reliant on the accuracy and completeness of the submitted documents and we do not take any responsibility for incorrect data or interpretation made by the authors.

The SFRA identifies the site as being within Flood Zone 1 with a low risk of fluvial and pluvial flooding. However, central part of the site is subjected to medium level of risk from ground water flooding, with groundwater levels measured between 0.025 m and 0.5 m beneath the ground surface and south-west portion of the site including the access are at a higher risk of groundwater flooding

The proposal seeks to redevelop Paddock 1 at Blackland Lakes by replacing existing touring caravan and storage pitches with a barn-style building containing four padel tennis courts, a cafe, reception, and seating area, while making use of the existing car park, which will only be formalised rather than newly constructed. However, the applicant has not provided a surface water drainage strategy. A full surface-water drainage strategy and clear drainage layout plan are required to demonstrate how runoff will be controlled, attenuated, and safely discharged without increasing flows elsewhere.



RECOMMENDATION

No objection subject to the following conditions

1. **No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.**

In order to discharge the above drainage condition the following additional information must be provided:

- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- The applicant needs to provide a full surface water drainage strategy, including a clear drainage layout/plan showing how runoff from the new building and hardstanding areas will be managed.
- If infiltration is proposed, the design shall be informed by infiltration tests undertaken in accordance with BRE 365, together with the results of seasonal groundwater monitoring.
or
If discharge to a watercourse or sewer is proposed, the applicant must submit pre- and post-development discharge rates in accordance with Wiltshire Council's [betterment policy](#) for greenfield sites.
- Pre and post-development exceedance routing that demonstrates flood risk is not increased elsewhere. (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#)).
- The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with the National Standards for SuDS [Standard 4: water quality](#).
- The applicant must adopt a 'SuDS approach' that maximises benefits for amenity through the creation of multi-functional places and landscapes (National Standards for SuDS: [Standard 5: amenity](#)).
- Details of how the proposed drainage features on the site will be maintained and managed after completion. (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- 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.
- 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.

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](#).

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.