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Planning App Ref:	PL/2026/01072
Service Ref:	Drainage
Date:	18/03/2026

PROPOSAL

Outline planning application, with all matters reserved except for the main point of access from Devizes Road, for the demolition of existing building and development of up to 80 dwellings, public open space, drainage, landscaping and ancillary works.

SITE LOCATION

Land North of Devizes Road, Hilperton, Trowbridge

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
- Concept Master Plan
- Design and Access Statement
- Flood Risk Assessment
- Location Plan
- Planning Statement
- Proposed Site Access Arrangements

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 proposal seeks outline permission to demolish the existing building and construct up to 80 homes with associated open space, landscaping, drainage and access from the Devizes Road/A361 roundabout on mainly greenfield land at Hilperton.

The FRA confirms a significant increase in impermeable area (approx. 1.757 ha). BRE365 tests show very poor infiltration and shallow groundwater (0.9–1.5 m bgl), ruling out infiltration SuDS. Surface water will be managed through detention basins, underground attenuation, permeable paving and rain gardens, providing storage for the 1 in 100 year + 45% climate change event and retaining the first 5 mm of rainfall as per National Standards 2 and 3. As no suitable watercourse exists within, adjacent to, or near the site, discharge to a watercourse has also been discounted in accordance with the SuDS hierarchy. In line with National SuDS Standard 1 (drainage hierarchy) and following the demonstrated failure of infiltration as a viable option, the applicant therefore proposes to discharge surface water to the Wessex Water surface water system at the agreed controlled rates.

Applying the LLFA-required 30% betterment, the proposed discharge rate for the 1-year event is 2.95 l/s. For the 30-year event, the proposed discharge rate of 7.26 l/s also reflects a full 30% betterment on the calculated pre-development 30-year greenfield runoff rate for the site, meaning the post-development peak flow remains significantly lower than the natural greenfield baseline and is fully compliant.

Wessex Water have confirmed 7.26 l/s as the maximum accepted rate to the Hilperton Drive sewer. Exceedance routing follows natural topography and finished floor levels will be raised by 300 mm providing greater resilience to proposed properties.

The submitted FRA is suitable for an outline application, providing adequate information on runoff rates, attenuation requirements, SuDS selection, infiltration constraints, and agreed discharge arrangements. However, further detail will be required at Reserved Matters stage or via planning conditions, including full hydraulic modelling, detailed basin design, a defined exceedance routing plan, and submission of ongoing groundwater monitoring data.

RECOMMENDATION

No objection subject to the following conditions

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:

- A fully detailed surface water drainage layout must still be submitted at detailed design stage, as although the applicant has provided pipe locations, manholes and flow arrows, the drawing remains indicative and does not yet include required technical details such as pipe gradients, levels (invert and cover) and pipe sizes.
- Comprehensive hydraulic modelling calculation for the 1-, 30- and 100-year storm events plus 45% climate change must be provided, including surcharge levels, pipe capacities, manhole flooding and freeboard, as no network modelling outputs have been included in the FRA (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))
- The exceedance routing plan must be submitted to demonstrate how surface water will safely flow during extreme events (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))
- To ensure the drainage strategy is presented as clearly as possible, the applicant should provide a simple summary table showing the greenfield runoff rates from FRA Table 5.1 alongside the corresponding proposed discharge rates for each return period, so that the level of betterment and the final outflow rates are set out transparently
- Given that groundwater was encountered at shallow depths (0.9–1.5 m) during the infiltration tests, updated groundwater monitoring results should be provided at the detailed design stage to confirm that seasonal groundwater levels will not conflict with, or reduce the effectiveness of, the proposed SuDS features.
- As-Built SuDS and Watercourse/Ditch Modification Drawings (AutoCAD Format)
No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer shall submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:
 1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
 2. As-built plans of all watercourses, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
 3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
 - AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
 - PDF format for record purposes.
 4. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.

An updated SuDS Maintenance Plan reflecting the final as-built arrangement. The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system

- The applicant must provide cross-section drawings for all proposed surface water features, showing levels, freeboard allowances, and depths, to demonstrate that the drainage system can function hydraulically and that adequate clearances are maintained.
- A construction-phase surface water management plan must be submitted and approved, setting out how runoff, sediment and pollution will be controlled during the works period, together with measures for monitoring and retaining existing vegetation and ensuring temporary drainage arrangements operate effectively throughout construction (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

INFORMATIVES

- All new drainage will be needed to comply fully with Building Regulations Part H. (they should engage with the building control department in order to ensure this).
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- 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.