

To:	Gen Collins	From:	James Playfair
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Planning App Ref:	PL/2025/09736
Service Ref:	Drainage
Date:	23 March 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

- Response letter to Drainage Comments
- Flood Risk Assessment
- Drainage Management Strategy

ASSESSMENT OF THE PROPOSAL

Context

In February 2026, the LLFA recommended a Holding objection as a significant amount of further information and detail was required to prove a credible drainage system is possible

Assessment

The revised 2026 FRA:

- Adds significant new analysis of surface water risk
- Incorporates climate change projections and future risk scenarios
- Provides far more detail on flood mitigation
- Addresses LLFA feedback from Feb 2026
- Introduces a recommendations section (absent in 2025)
- Provides better alignment with latest PPG (2025) and EA mapping
- Provides stronger justification for outline approval

The 2026 revised Drainage Strategy still contains significant gaps: acceptability of infiltration for SW disposal, treatment index, detailed maintenance plan, basin cross-sections, exceedance diagrams, infiltration testing results etc should be provided to ensure a credible drainage strategy is possible.

We are currently concerned that the applicant is proposing discharge to the highways drainage system without having assessed the condition or capacity of said system. As such the applicant is currently unable to demonstrate that they are not increasing flood risk elsewhere because of their proposals.

The presented drainage strategy is currently reliant on a pipe-to-pond system, and consideration for source control features (which would potentially reduce space available for housing / significantly impact on the development layout) has not been provided. We acknowledge the outline nature of the application; however we require additional information to be provided that a drainage strategy in full compliance with National Standards for SuDS and Wiltshire Council policy will be provided as part of the Reserved Matters Stage.

RECOMMENDATION

Holding objection

The nine recommendations as outlined in the DMS should be completed before the holding objection can be removed. Explicitly the requirements are

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.

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.
- 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.
- 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 $0\text{m}^3 / \text{ha}$ 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.
- 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](#).