

To:	Julie Mitchell	From:	James Playfair
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Planning App Ref:	PL/2026/01383
Service Ref:	Drainage
Date:	1 April 2026

PROPOSAL

Full planning permission

The development of 90 dwellings with new access from Blind Lane internal roads and footpaths, areas of open space (including play space), drainage, landscaping and associated plant and works

SITE LOCATION

Land off Blind Lane, Southwick, Wiltshire

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

- Drainage Technical Note
- Drainage Strategy
- Flood Risk Assessment

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.

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 Site comprises existing vacant land used for agricultural purposes. Proposals involve the erection of 90 new dwellings.

The site is not subject to tidal flooding and is located primarily in Flood Zone 1 (low probability). A thin strip of Flood Zones 2 and 3 runs parallel to an existing watercourse along the southeastern site boundary. All of the built development will be wholly within Flood Zone 1. Residential development is deemed appropriate by the NPPF in Flood Zone 1.

The site has isolated surface water flooding adjacent to the boundary, but it does not encroach onto the site.

The site has an area of high groundwater emergence risk but all of the built development will be in areas of low groundwater emergence risk.

A surface water drainage strategy based on two attenuation ponds which discharge to an existing waterbody at a controlled rate has been proposed. Currently insufficient information has been provided with regards the hydraulic interaction with the receiving watercourses.

Climate change is mentioned within the report, and shown to be applied at +45% on the 1 in 100yr events on the Microdrainage Calculations presented within Appendices F-G. The applicant should note that climate change should also be applied to the 1 in 30yr rainfall events in line with EA Climate Change guidance, with the 1 in 30yr results also presented as part of the hydraulic model simulation results.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The developer should provide the following information in accordance with the [National Standards for SuDS \(2025\)](#):

Standard 1: runoff destinations

The applicant must submit evidence demonstrating how runoff from the development will be discharged to the following final destinations, to the maximum extent practicable, in accordance with Standard 1 of National Standards for SuDS. The discharge hierarchy is set out below – currently the highest priority option (collection of water for reuse) has not been fully considered.

- **priority 1: collected for non-potable use**
- priority 2: infiltrated to ground
- priority 3: discharged to an above ground surface water body
- priority 4: discharged to a surface water sewer, or another piped surface water drainage system
- priority 5: discharged to a combined sewer

The applicant must outline how water collection for re-use has been fully considered as part of their proposals.

REASON: As stated in the National Standards for SuDS, the aim should be to discharge surface water run-off, to the maximum extent practicable, as high up the drainage hierarchy as possible.

Standard 2: interception

The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS, relying on a pipe-to-pond system with no source control features.

Evidence shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS. Calculations that demonstrate compliance with these interception requirements should be provided.

REASON: To ensure rainfall for the majority of rainfall events does not result in runoff from the site to surface waters or piped drainage systems.

Standard 3: management of extreme rainfall and flooding

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. The only exception to this would be if the applicant accurately provided revised estimate of additional storage capacity within the network and used that as the basis for their hydraulic model.

A construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

REASON: There's a statutory duty to ensure that surface water quality and quantity is managed throughout construction and as not to increase flood risk, or pollution of watercourses

Evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.

REASON: To ensure that any flooding resulting from a surcharged outfall will not affect people or property, and that following periods of high rainfall, that the site is able to drain down as anticipated.

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.

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).

The applicant must explicitly outline details of how silt will be captured and disposed of such that it does not reduce storage capacity within the attenuation basins.

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

A plan showing the cross sections and design of any attenuation pond and its components.

As the proposed drainage strategy will drain an area greater than 1000m² to attenuation basins, as per the guidance within the SuDS Manual, the applicant must provide an assessment from a suitably qualified ground engineering professional that the basins are appropriately designed and will not pose a geotechnical risk.

A construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

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.

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](#).

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 watercourse, 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.
5. 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.

Reason: To ensure the constructed drainage system and watercourse/ditch modifications accord with the approved design, to maintain accurate LLFA drainage records, and to ensure the development does not increase flood risk on- or off-site, in accordance with the NPPF and Wiltshire Council SuDS guidance.

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.