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| <b>To:</b> | Lucy Rutter-Dowd | <b>From:</b> | Drainage (Barney Taylor) |
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|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2026/01963 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 20/04/2026    |

## PROPOSAL

*Outline planning permission: All matters reserved for the residential development for up to 175 dwellings, associated works (including demolition), infrastructure, ancillary facilities, open space and landscaping. Construction of a new vehicular access off Coate Road and Windsor Drive.*

## SITE LOCATION

*Land South of Coate Road, Devizes*

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required | <b>x</b> |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              |          |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Covering Letter*
- *Flood Risk Assessment & Drainage Strategy – Part 1 & 2*
- *Ground Investigation Report*
- *Indicative Masterplan*
- *Planning Statement*
- *Site Location 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 applicant's proposed drainage strategy does not demonstrate adherence to the National Standards for SuDS, Standard 1 or Standard 2. The LLFA requires the applicant to propose further source-control SuDS across the extent of the site to intercept and attenuate surface water flows at source. The applicant should note that a pre-development catchment plan is required to demonstrate there is no catchment transfer when discharging to the highway drain. The applicant is also required to demonstrate adherence to the surface water disposal hierarchy – notably that no other alternative higher than discharging to the highway drain is achievable. This information is required at this stage of the application.

## RECOMMENDATION:

### Holding Objection for the following reasons:

1. National Standards for SuDS: [Standard 1: runoff destinations](#)

- a) It is noted in the Executive Summary and Section 6.2 of the FRA & Drainage Strategy that the applicant proposes to discharge surface water from the western catchment to the highway drain in Windsor Drive.

The applicant must provide a pre-development catchment plan to demonstrate the entirety of the western catchment drains to the highway drain in the existing scenario.

- b) The applicant must confirm the condition of the highways drainage system from the proposed point of connection to the outfall location to demonstrate the connection is viable.
- c) To demonstrate adherence to paragraph 1.2 of the National Standards for SuDS (the surface water disposal hierarchy), the applicant must provide evidence to demonstrate all options above discharging to the highway drain have been exhausted.

2. National Standards for SuDS: [Standard 2: management of everyday rainfall \(interception\)](#)

In line with paragraph 2.6 of the National Standards for SuDS, the applicant must provide evidence 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. These features shall naturally absorb or retain runoff and from these the runoff will be 'lost' to soils or the atmosphere and will not discharge off the site.

3. National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#)

In accordance with Standard 3 of the National Standards for SuDS, the applicant must provide a drawing demonstrating the overland exceedance routes for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate flood risk is safely managed onsite, without increasing flood risk to people & property.

### **Once the drainage objections have been resolved, the following information can be managed via condition:**

1. Further information is required relating to the surface water drainage strategy:

- a) While noting the applicant has provided some example sections of SuDS features, at detailed design, the applicant must provide accurate cross & long sections details, including levels & freeboards, for all SuDS features proposed.
- b) At detailed design, further source-control SuDS are required to demonstrate adherence to the National Standards for SuDS (Standards 3, 4, 5 & 6), and water butts to demonstrate rainwater harvesting will be utilised where possible. We note the applicant has stated that these proposals will be realised at detailed design.
- c) There is surcharging in the 1 in 2-year event in the modelling submitted by the applicant. The applicant must resubmit this modelling, without any surcharging – except for immediately prior to the outfall.

- d) At detailed design, the applicant must provide evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, 150mm above the adjacent SW drainage cover levels.
- e) While noting the applicant has provided an example maintenance regime, at detailed design the applicant must provide a maintenance strategy that outlines each maintenance activity, the frequency of each activity, and who is responsible for each activity.

If any maintenance activity will be the responsibility of individual plot owners, the applicant must ensure a copy of the agreed drainage strategy & associated maintenance regime are included in the title deeds of the property.

- f) The applicant must submit a construction management plan to demonstrate how flood risk to people & property, and pollution risk to groundwater & watercourses will be mitigated throughout construction.

## INFORMATIVES

The applicant must gain consent to discharge foul sewage into the foul sewer system from the local sewerage undertaker.

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](#).

## 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.