

To:	Steven Sims	From:	James Playfair
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Planning App Ref:	PL/2026/02472
Service Ref:	Drainage
Date:	8 th May 2026

PROPOSAL

Approval of reserved matters

Details of Landscaping, Appearance, Layout and Scale pursuant to the outline planning permission PL/2023/01880 approved at appeal (APP/Y3940/W/24/3352160)

SITE LOCATION

Land Rear of 117, High Street, Dilton Marsh

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 Layout
- Drainage Technical note
- Engineering Layout
- Exceedance flow plan
- Impermeable area

ASSESSMENT OF THE PROPOSAL

Context

The application proposals have generated significant levels of local objection with the main issues being

- Whether the site is suitable location
- Ecology
- Whether the statutory tests are satisfied.

Some residents raised the matter for potential flood risk, the FMA presented at appeal included mitigation measures and SUDs features. The council raised no objections subject to appropriate conditions to secure the drainage measures

In February 2024 the LLFA requested a detailed surface water drainage strategy for the site has been submitted to and approved in writing by the LLFA & LPA. This would include:

- Greenfield runoff rates, and proposed discharge rates for the whole site, demonstrating that the applicant has complied with the Wiltshire Council betterment policy
- (i.e. With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 20% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event.)
- An overland flow plan demonstrating that the proposed mitigation measures / berm-creation works will not alter overland flow paths and result in an increase in local flood risk to adjacent people / property / infrastructure.
- Details of proposed groundwater mitigation / control measures
- A construction management plan, together with details of drainage arrangements during the construction phase, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

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 submitted Drainage Technical Note for the proposed development at Dilton Marsh has been assessed against Wiltshire Council Lead Local Flood Authority (LLFA) guidance and the National Sustainable Drainage Systems (SuDS) Standards (DEFRA, July 2025). The site comprises approximately 3.0 hectares of greenfield land within Flood Zone 1, underlain by clayey soils with high groundwater levels.

The drainage strategy follows the SuDS hierarchy, with infiltration discounted on technical grounds and surface water discharge proposed to a nearby watercourse at controlled rate. Surface water runoff is attenuated via a network of lined SuDS features including permeable paving, swales, rain gardens and offline attenuation basins, with flows restricted to approximately QBAR (circa 5.6–6.0 l/s), including betterment and allowance for the 1 in 100 year rainfall event plus 40% climate change. Hydraulic calculations using FEH-22 data confirm adequate storage provision.

Section 3.7 states that as part of the detailed design, rainwater harvesting should be considered. This should not be deferred until later due to the impact this will have on the overall drainage strategy for the site.

Section 3.16 – States that waterbutts will be provided but it's also stated in Section 3.7 that water butts should be used as a minimum. This currently is inconclusive as to what the applicant is proposing to provide in the drainage strategy.

Section 3.20 – We require further evidence that all impermeable area will drain to a “permeable” feature. Specifically, would like to see how the runoff from the roads is explicitly managed

Section 3.21 - A climate change uplift of 45% is the current standard – the climate change allowance will therefore need to be updated within the calculations.

Submitted calculations show additional attenuation storage at 20m³/ha – this must be set to 0m³/ha or additional justification provided

Need cross sections & long sections of the attenuation features – Details are required as to how water moves from one basin to the next

If any trees are to be newly planted then they should be designed as SuDS tree pits, with appropriate inlets etc from the internal roads or justifiable reasons provided why they cannot

Existing watercourse that will be curtailed (nr S8) will require formal LDC from the LLFA (as will the construction of outfalls). How has overland exceedance in this area been considered?

Raingardens shown next to proposed highways gullies and not shown with any connection to the drainage system – details of raingardens (incl cross sections and long sections) to be provided to LLFA.

Further details are required as to what is the large triangular basin is.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

The developer should provide the following information as part of future planning applications in accordance with the [National Standards for SuDS](#):

Standard 1: runoff destinations

- As part of detailed design works, it must be reviewed whether a rainwater harvesting system can be effectively incorporated to the proposed plots.
- 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. i.e. use of water Butts, tree pits, raingardens permeable paving and attenuation basins
- Calculations which demonstrate that the required 30% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events in accordance with Wiltshire Council's betterment policy update (30%), which can be found [here](#).
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Evidence that there is sufficient freeboard (300mm minimum) above the critical 1 in 100yr + climate change storm event.

Standard 3: management of extreme rainfall and flooding

- 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.
- 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.
- 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 (45%) rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Exceedance routes that minimise the risks to people and property especially where water courses have been curtailed

Standard 3: management of extreme rainfall and flooding

- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.

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. The plan must show how water will move between ponds

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

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.

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.

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.