

To:	Jane Sanger	From:	Rahul Dixit
------------	-------------	--------------	-------------

Planning App Ref:	PL/2025/09284
Service Ref:	Drainage
Date:	12/05/2026

PROPOSAL

Full application for removal of storage area for proposed Agricultural storage building and Padel Court use.

SITE LOCATION

Lower Farm, Devizes Road, Rowde, Devizes, SN10 2LX

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
- Location Plan
- Existing Block Plan (April 2026)
- Proposed Block Plan (April 2026)
- Proposed Elevations (April 2026)
- Site Section (April 2026)
- Drainage Calculations (April 2026)

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 applicant has reconsulted with revised plans and drainage calculation details; however, the updated documents does not address all the issues raised in the previous drainage response issued on 29/12/2025.

It is acknowledged that the applicant has submitted drainage calculations for greenfield runoff rates and attenuation volume requirements, along with a drainage network layout plan; however, it is unclear from the submitted calculations whether the proposed controlled discharge rate is 0.6 l/s or 6 l/s. If a discharge rate of 6 l/s has been adopted, it should be noted that this value appears to correspond to a rate expressed in litres per hectare per second (l/s/ha), and given that the site area is 0.07 hectares and provided calculation, the discharge rate ($\bar{Q}_A$) should be approximately 0.4 l/s; therefore, the applicant is requested to clarify the discharge rate used and ensure that it has been derived correctly in accordance with the site area.

Catchment details

Subcatchment	Name	Area (ha)	PIMP (%);	Impermeable. area (ha)
1;	Proposed Building ;	0.07;	100.0;	0.07;
Total		0.07;	100.0;	0.07;

Greenfield runoff rates

Catchment area;

Greenfield runoff rate (50 hectare site);

Greenfield runoff rate;

Greenfield runoff rate per unit area;

Estimated site discharges

FSR growth rate (1 year);

Discharge (1 year);

FSR growth rate (30 year):

AREA = 50.00 hectare

$\bar{Q}_{rural} = 0.00108m^3/s \sim (AREA/1km^2)^{0.89} \sim (SAAR/1mm)^{1.17}$

$SPR^{2.17} = 303.0 \text{ l / s}$

$\bar{Q} = \bar{Q}_{rural} / AREA \sim A = 0.4 \text{ l / s}$

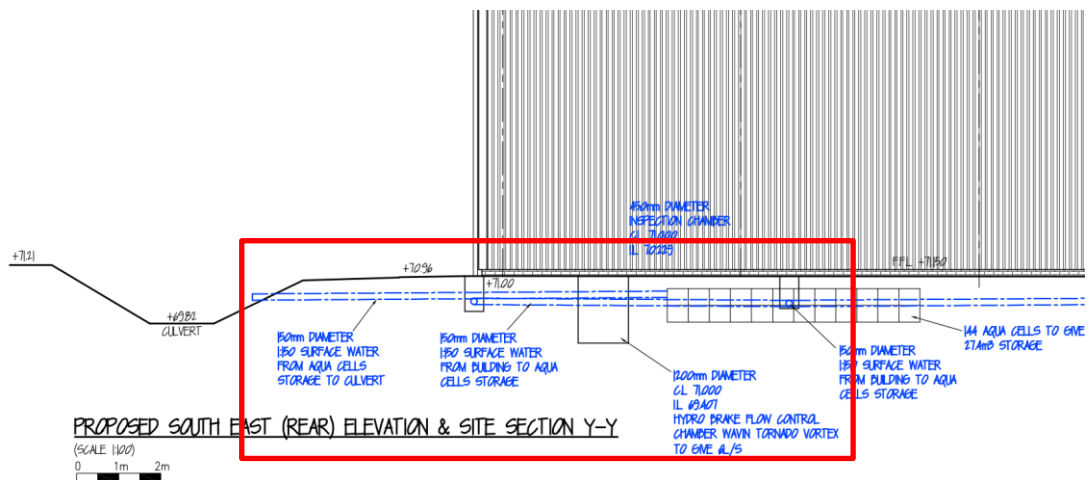
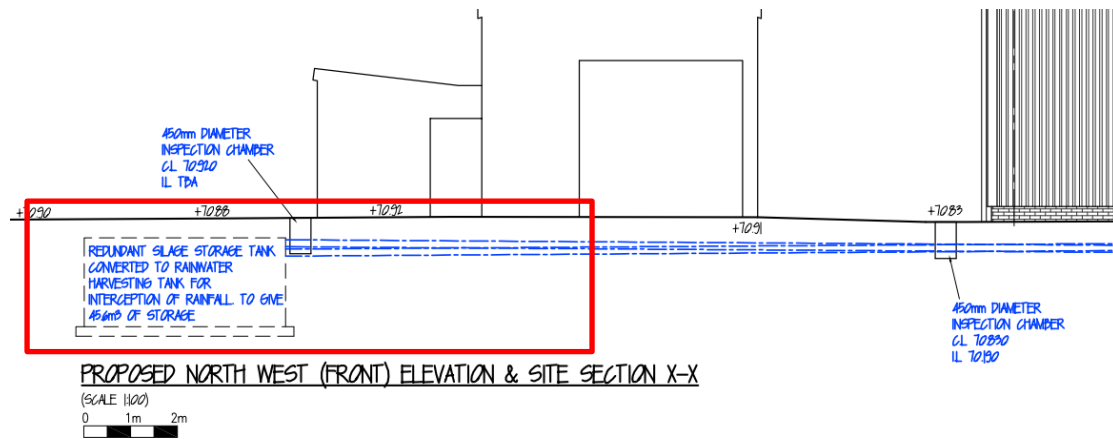
$\bar{Q}_A = \bar{Q} / A = 6.1 \text{ l / s / hectare}$

$FSR_{1yr} = 0.78$

$Q_{1yr} = \bar{Q} \sim FSR_{1yr} = 0.3 \text{ l/s}$

$FSR_{30yr} = 1.95$

Furthermore, based on the provided section drawings, it is unclear how water from the attenuation feature will be fully drained to the nearby watercourse, as the outlet has been shown near the top of the proposed attenuation structure. If the applicant intends to position the outlet pipe at the base of the structure, clarification is required on how the outfall will be connected to the receiving watercourse, particularly considering the depth of the attenuation feature.



Therefore, the conditions set out in the previous drainage response remain applicable to this development until the applicant provides additional information to discharge that condition.

RECOMMENDATION

No objection subject to the following conditions

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, National Standards for SuDS 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 Detailed sectional drawing for all proposed SuDS features shall be submitted. These should clearly show the outlet invert levels and demonstrate how discharge is conveyed into the existing watercourse, particularly noting that the base levels of the proposed SuDS features are lower than the bed level of the receiving channel.
- Pre and post development discharge rates. With regards the control of surface water discharges from brownfield sites, Wiltshire Council requires post development discharges to be as close as reasonably practicable to greenfield runoff for both peak flow and volume. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at 150 mm height above the SW drainage cover levels.
- 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](#).

INFORMATIVES

- 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.

- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- 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.