

To:	Joe Richardson	From:	Drainage Team
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Planning App Ref:	PL202409976
Service Ref:	Drainage
Date:	22/05/2026

PROPOSAL

Outline Planning Permission: Some matters reserved

Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 28 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments

SITE LOCATION

Land off Southampton Road and Junction Road, Alderbury, Wiltshire

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 (*Dec24*)
 - Covering Letter (*Dec24*)
 - Flood Risk Assessment and Drainage Strategy (*Dec24*)
 - Design and Access Statement- Part 1 (*Dec24*)
 - Design and Access Statement- Part 2 (*Dec24*)
 - Existing Block Plan (*Dec24*)
 - Existing Site Plan (*Dec24*)
 - Landscape and Visual Appraisal - Appendix A (*Dec24*)
 - Landscape and Visual Appraisal - Appendix B (*Dec24*)
 - Phase I Geo-Environmental Desk Study (*Dec24*)
 - Planning Statement (*Dec24*)
 - Proposed Site Plan (*Dec24*)
 - Topographic Survey (*Dec24*)
 - Soft Landscape Strategy-01 (*Dec24*)
 - Soft Landscape Strategy-02 (*Dec24*)
 - Soft Landscape Strategy-03 (*Dec24*)
 - Soft Landscape Strategy-04 (*Dec24*)
 - Agent's response to Drainage Comments (*Feb25*)
 - Drainage Strategy (*Feb25*)
 - Surface Water Flood Map (*Feb25*)
 - Topographic Survey – Appendix D (*Feb25*)
 - Email from Agent Re Drainage (*Mar 25*)
 - Drainage Strategy (*Mar 25*)

- Appendix I – Greenfield Run-Off Rate (*Mar 25*)
- Existing Drainage Catchment Area (*Mar 25*)
- Drainage Consultant Response to Comments (*April25*)
- Design and Access Statement (*April25*)
- Soft Landscape *Strategy* (*April25*)
- Indicative Proposed Site Layout (*April25*)
- Flood Risk Assessment and Drainage Strategy (*May26*)
- Planning Statement (*May26*)

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 site is in Flood zone 1 and has a low risk of groundwater flooding and risk of surface water flooding of 1 in 1000.

The applicant has re-consulted the LLFA with a revised Flood Risk Assessment and Drainage Strategy. The revised drainage strategy results in a degree of catchment transfer and does not achieve formal betterment over greenfield runoff rates; however, the discharge has been restricted to the Qbar rate of 1.8 l/s has been previously agreed as the LLFA are confident downstream flood risk will not be impacted. When considered alongside the significant reduction in development scale to 28 dwellings, the associated reduction in impermeable area, and the provision of attenuation storage to accommodate up to the 1 in 100 year plus climate change event, it is not considered that the proposals will materially increase flood risk.

The drainage strategy is acceptable in principle, subject to confirmation at the detailed design stage of exceedance flow routing and the incorporation of appropriate source control and interception SuDS measures, ensuring the development is not reliant solely on end-of-line attenuation.

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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 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:

- Detailed exceedance flow routing plans must be submitted for the 1 in 100-year plus climate change event, including pre- and post-development scenarios, with specific focus on the south-western area of the site where exceedance and surcharge risk has been identified. (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))
- The applicant must provide a clear justification for the use of below-ground attenuation, demonstrating that blue/green SuDS features (such as swales, basins and rain gardens) have been fully considered in line with best practice and discounted only where demonstrably unfeasible.
- The provision of permeable paving to individual dwellings is acknowledged as contributing towards interception storage. Further details of the SuDS strategy demonstrating a full management train, including source control measures, interception storage for the first 5 mm of rainfall, and confirmation that the system is not solely reliant on below-ground attenuation. (National Standards for SuDS: [Standard 2: management of rainfall \(interception\)](#))
- The submitted BGS GeoReport is limited to a desk-based assessment of ground conditions and does not include site-specific infiltration testing. In accordance with the surface water hierarchy and given the scale of the site, a site-specific infiltration test, including BRE365 soakaway testing and groundwater monitoring, must be undertaken to demonstrate that infiltration has been robustly assessed and exhausted where discounted. (National Standards for SuDS: Standard 1: [runoff destinations](#))
- The applicant shall provide written evidence of third-party consent for discharge to the receiving watercourse and for any connections to external drainage systems.
- Sensitivity testing of the drainage network, including simulation of surcharged outfall and partial blockage scenarios, to demonstrate resilience under worst-case conditions.
- Clear arrangements for the ownership and ongoing maintenance of the SuDS over the lifetime of development.
- 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, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. (National Standards for SuDS: [Standard 7](#))

INFORMATIVES

- The applicant should note that if the intention is to offer the roads for adoption, the LLFA does not provide for the approval of drainage suitable for adoption by the Highway Authority. Further approval should be ascertained from the Highway Authority. To find out more about the processes required to secure road adoption, contact the Highway Authority at HighwaysDevelopment@wiltshire.gov.uk.
- 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](#).

- There must be no interruption to the existing surface water and or land drainage arrangements of the surrounding land because of the operations on site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.

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.