

To: Development Management

From: Drainage Team Rohit Singh

Planning App Ref: PL/2026/02943 Service Ref: LLFA

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PROPOSAL

Outline application (with all matters reserved except for access) for the erection of up to 224 residential dwellings (Class C3), 72-bed care home (Class C2), with sports pitch provision, country park, allotments, landscaping and open space.

SITE LOCATION

The application site is located predominantly within Flood Zone 1, indicating a low probability of fluvial flooding, which is consistent across the main developable areas (Fields 1 and 2). However, there are notable site-specific constraints at the northern and eastern extents, where land lies in closer proximity to the River Avon, Widbrook, and associated floodplain areas, with parts of the wider site identified within Flood Zones 2 and 3. These areas are currently proposed as open space, which aligns with national policy in directing more vulnerable development away from higher-risk zones. Nevertheless, the presence of these floodplain areas introduces constraints in terms of hydraulic connectivity, exceedance routing, and potential backwater effects, particularly given the interaction between the river, canal (within ~50 m), and local drainage network

In addition to fluvial influences, the site is affected by groundwater and local surface water considerations, particularly due to the underlying geology and proximity to watercourses. The Phase 2 investigation confirms seasonally elevated groundwater levels, in some locations rising to within 1 m of ground level, which has implications for infiltration-based SuDS, foundation design, and resilience to prolonged wet conditions. The site also slopes toward the River Avon and surrounding drainage features, meaning that overland flow pathways and conveyance routes will be an important design consideration to ensure runoff is safely managed without increasing risk downstream. Furthermore, the presence of a nearby historic landfill and aquifer designations highlights the need for careful consideration of water quality and pollutant pathways in drainage design. Collectively, while the site benefits from a generally low fluvial risk in developable areas, these constraints require a robust and integrated drainage strategy addressing groundwater, exceedance flows, and interface with adjacent water environments.

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Cover Letter
- Design and Access Statement
- Flood Risk Assessment and Drainage Strategy
- Illustrative Masterplan Layout
- Parameter Plan
- Phase 1 Desk Study and Site Walkover
- Phase 2a Preliminary Ground Investigation
- Planning Statement
- Site Location Plan

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.

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

1. Flood Risk Assessment and Sources of Flooding

A Flood Risk Assessment has been submitted in support of the application, and at a proportionate level it identifies that the majority of the developable area lies within Flood Zone 1, with areas of Flood Zones 2 and 3 confined to land adjacent to the River Avon and proposed public open space. While this demonstrates an appropriate strategic understanding of fluvial risk and supports the acceptability of land use distribution, the assessment does not clearly evidence a comprehensive multi-source review. In particular, there is limited clarity regarding risks from pluvial, sewer, reservoir and canal sources, despite the proximity of the Kennet and Avon Canal and local drainage features. As such, the FRA is considered only partially compliant at outline stage.

2. Sequential Approach and Site Layout

The application adopts an appropriate sequential approach within the site, with the most vulnerable development located within Flood Zone 1 and higher-risk areas retained as open space. This aligns with national policy requirements and demonstrates that the development can be accommodated on the lowest-risk parts of the site in principle. On this basis, the application is considered acceptable in sequential terms at outline stage and the Exception Test is not triggered.

3. Surface Water Drainage Strategy (Principle)

A conceptual surface water drainage strategy has been provided, indicating a SuDS-led approach incorporating swales, ponds and wetlands. However, the submission does not clearly demonstrate how the existing drainage regime has been interpreted or how runoff will be managed post-development. There is no clear evidence of greenfield runoff calculations, nor defined catchment areas draining to each outfall. As such, the strategy does not adequately establish baseline runoff conditions or demonstrate compliance with Wiltshire Council discharge policy. In addition, no evidence is provided to demonstrate that interception of the first 5mm of rainfall can be achieved across the site in accordance with National SuDS Standards.

4. Infiltration Feasibility and Groundwater Constraints

Ground investigation data identifies that groundwater levels can rise to within approximately 1 m of ground level during seasonal peak conditions. This represents a significant constraint to the use of infiltration-based SuDS techniques. While infiltration testing has been undertaken, the submission

does not demonstrate that infiltration features can operate effectively within these groundwater conditions, nor that appropriate separation distances or drain-down criteria can be achieved. Consequently, reliance on infiltration as a primary drainage mechanism is not currently justified.

5. Attenuation Strategy and Discharge Arrangements

The application does not provide sufficient detail regarding the proposed attenuation strategy or discharge arrangements. There is no clear identification of post-development catchments, discharge rates, or confirmation of compliance with greenfield runoff standards. In addition, there is no demonstration that attenuation features can be appropriately located outside Flood Zones 2 and 3 or otherwise protected from inundation. Therefore, it has not been demonstrated that runoff from the site can be managed without increasing flood risk elsewhere. In addition to peak flow control, there is no evidence that post-development runoff volumes (including the 1 in 100 year, 6-hour event) will be managed to ensure no increase in flood risk downstream.

6. Hydraulic Performance and Exceedance Management

No hydraulic calculations or indicative storage volumes have been provided to demonstrate performance under the 1 in 30 year or 1 in 100 year plus climate change events. Furthermore, the submission does not demonstrate compliance with interception requirements or provide evidence of exceedance flow routing. While the site generally slopes toward the River Avon, no mapped exceedance routes or confirmation of safe conveyance pathways away from built development areas are provided. Furthermore, there is no consideration of overland flow routes entering the site from adjacent or upstream land. There is also no proportionate residual risk assessment (e.g. blockage of outfalls or system failure) to demonstrate that flood risk can be safely managed under such scenarios. This represents a significant omission at outline stage.

7. Groundwater, Topography and Off-Site Interaction

The site is influenced by a combination of elevated groundwater levels, sloping topography and proximity to sensitive water environments including the River Avon and Kennet and Avon Canal. These constraints are critical in determining the viability of the drainage strategy. The submission does not demonstrate how runoff will be managed to avoid adverse impacts on downstream receptors, nor does it assess potential hydraulic interaction with adjacent watercourses. The influence of groundwater on network performance and resilience has also not been adequately reflected in the drainage design. The absence of this information means it is unclear how the drainage system will perform under combined groundwater and surface water conditions, particularly during prolonged or extreme rainfall events.

8. Water Quality and Treatment Train

The application does not provide a clearly defined SuDS treatment train or water quality assessment. Given the site's hydrogeological sensitivity and

proximity to a historic landfill, there is potential for pollutant mobilisation and pathways to controlled waters. The absence of a defined treatment strategy means that it has not been demonstrated that surface water runoff will be adequately treated prior to discharge, contrary to national SuDS standards.

9. Drainage Layout and Integration with Development

Indicative drainage features are shown within the illustrative masterplan, demonstrating that sufficient land may be available to accommodate SuDS features in principle. However, there is no detailed drainage layout, no demonstration of finished floor levels relative to flood risk, and no clear indication of how exceedance flows or upstream runoff will be managed. While an outline-level approach is acceptable at this stage, the lack of clarity limits confidence in the integration of drainage with the proposed development layout. No high-level finished floor level strategy has been provided to demonstrate that buildings can be set appropriately above surrounding ground levels and flood risk in accordance with national guidance. There is also no confirmation that sufficient space and depth is available within the layout to accommodate attenuation features with appropriate freeboard.

10. Deliverability and Legal Considerations

The submission does not provide clear evidence of a feasible point of discharge or confirmation that any required third-party agreements can be secured. There is no indication of engagement with asset owners or confirmation of available capacity within receiving systems. It has therefore not been demonstrated that the drainage strategy is deliverable in practice, and further information is required to confirm that all necessary consents can be obtained.

11. Overall Position

In summary, the application demonstrates that development is appropriately located in flood risk terms and is acceptable in principle at outline stage. However, the supporting information does not provide sufficient evidence to demonstrate that a robust and policy-compliant surface water drainage strategy can be delivered. Significant uncertainties remain regarding groundwater constraints, the viability of infiltration, the definition of discharge arrangements, hydraulic performance, exceedance routing, water quality management and overall deliverability. Further information is required to confirm that the development can safely manage surface water runoff without increasing flood risk elsewhere.

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:

1. Updated Flood Risk Assessment covering all sources of flooding (including pluvial, groundwater, sewer and canal) – to demonstrate that flood risk from all relevant sources has been fully assessed in accordance with national guidance.
2. Assessment of groundwater constraints and implications for drainage strategy – to demonstrate how seasonally high groundwater levels (identified within ~1 m of ground level) have been accounted for and that the proposed drainage approach remains viable.
3. Clarification of surface water drainage strategy and justification in line with the drainage hierarchy – to confirm whether infiltration is feasible and, if not, to justify the proposed discharge route in accordance with national SuDS standards.
4. Greenfield runoff calculations (FEH/IH124) and existing catchment plans – to establish baseline runoff rates and confirm that post-development discharge rates will comply with Wiltshire Council policy without introducing catchment transfer. This should include confirmation that no inappropriate redistribution of runoff between sub-catchments occurs.
5. Proposed drainage catchment plan and discharge rates (1 in 1, 1 in 30, 1 in 100 year + climate change events) – to demonstrate that peak flow control can be achieved across the site. This should also demonstrate compliance with runoff volume control requirements, including the 1 in 100 year, 6-hour critical duration event.
6. Outline attenuation strategy and indicative storage calculations – to confirm that sufficient land and storage volume can be accommodated to manage runoff up to the 1 in 100 year + climate change event without increasing flood risk elsewhere.
7. Conceptual exceedance flow routing plan – to demonstrate that flows exceeding the design standard can be safely conveyed across the site without impacting buildings, infrastructure or third-party land. This should include identification of any overland flow routes entering the site from upstream land.
8. Preliminary assessment of downstream impact and interaction with receiving watercourses (including River Avon and canal network) – to demonstrate that the proposed development will not increase flood risk off-site. This should include a proportionate residual risk assessment (e.g. blockage of outfalls or system failure) to demonstrate system resilience.
9. Water quality assessment and SuDS treatment train strategy – to demonstrate that runoff will be appropriately treated prior to discharge, particularly in light of the nearby historic landfill and underlying aquifer sensitivity.

10. Evidence of a feasible point of discharge and confirmation of engagement with relevant asset owners or landowners – to demonstrate that the proposed drainage strategy is deliverable in practice.

11. High-level drainage layout demonstrating integration with the site masterplan (including indicative SuDS locations and finished floor level strategy) – to confirm that a compliant drainage system can be accommodated within the development in principle. This should also demonstrate that sufficient space and depth is available to accommodate attenuation features with appropriate freeboard.

12. Evidence that the drainage strategy can achieve interception of the first 5mm of rainfall across the site in accordance with National SuDS Standards – to demonstrate compliance with runoff reduction and water quality objectives.

Informatives

The following informatives are provided to guide the applicant on the requirements for detailed design and implementation of the drainage strategy. These are intended to ensure that surface water management is undertaken in accordance with current national and local policy, best practice guidance, and statutory requirements, and to highlight key considerations that will need to be addressed at subsequent stages of the planning process.

1. Drainage hierarchy compliance

The developer is advised that surface water drainage proposals must follow the drainage hierarchy set out in the National Planning Practice Guidance and National SuDS Standards. Infiltration should only be used where demonstrated to be feasible, taking into account site-specific constraints including groundwater levels.

2. Groundwater considerations

Given the presence of seasonally high groundwater levels on site, the developer should ensure that drainage design and SuDS features are informed by site-specific investigation of peak winter groundwater conditions. Design should ensure no adverse impacts on system performance or flood risk.

3. Requirement for SuDS design in accordance with best practice

All drainage systems should be designed in accordance with CIRIA SuDS Manual (C753), ensuring appropriate treatment train, multi-functional design, and long-term resilience to climate change.

4. No increase in flood risk elsewhere

The developer must ensure that surface water runoff from the site is managed so that there is no increase in flood risk to third-party land, watercourses, or downstream receptors, including the River Avon and associated drainage network.

5. Exceedance flow management

The developer is advised that exceedance flows (events exceeding the design standard) must be safely managed on site to prevent flooding of buildings, infrastructure or adjacent land.

6. Water quality protection

Appropriate pollution control and treatment measures must be incorporated into the drainage strategy to protect controlled waters, particularly given the proximity to sensitive receptors and potential contamination sources in the vicinity.

7. Discharge consents and permissions

The applicant is advised that separate consents may be required for any works affecting watercourses, including Land Drainage Consent from the Lead Local Flood Authority or Environmental Permits from the Environment Agency. Approval of planning permission does not grant consent for such works.

8. Third-party agreements

The developer is responsible for securing any third-party land agreements, easements, or connection rights required for the drainage system. Planning permission does not override private property rights.

9. Sewer connections

Any proposed connection to the public sewer network must be agreed with the relevant sewerage undertaker. The granting of planning permission does not guarantee capacity or approval for connection.

10. Long-term maintenance

The developer should ensure that appropriate maintenance arrangements are put in place for all drainage infrastructure for the lifetime of the development, including access arrangements and clearly defined responsibilities.

11. Climate resilience

The drainage design should account for climate change and future rainfall intensification to ensure long-term resilience and adaptability of the system

12. Land Drainage Consent

The applicant is advised that any works affecting an ordinary watercourse (including culverting, diversion, or construction of outfall structures) will require prior consent under Section 23 of the Land Drainage Act 1991 from the Lead Local Flood Authority. Works affecting a Main River may require an Environmental Permit from the Environment Agency. The granting of planning permission does not remove the requirement to obtain these separate consents.