

To:	Helena Carney	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/02443
Service Ref:	Drainage
Date:	10/06/2026

PROPOSAL

Full planning permission

Erection of 47 dwellings with associated access, internal roads, parking, public open space, landscaping, drainage and associated infrastructure.

SITE LOCATION

Land at White Street, West Lavington, Wiltshire SN10 4HR

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

- Application Form
- Construction Phase Drainage Layout-2
- Design and Access Statement - Parts 1-8 Combined
- Drainage Maintenance Plan
- Elevations
- Flood Risk Assessment - Part 1
- Flood Risk Assessment - Part 2
- Illustrative Site Plan
- Location Plan
- Planning Statement
- Site Layout
- Sustainability Statement - Part 1
- Sustainability Statement - Part 2

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.

In the absence of any infiltration potential, nearby watercourses, or existing surface water sewers, the applicant is proposing to discharge surface water flows from the development to a nearby highway drain at a restricted discharge rate. WC Highways have confirmed that a connection can be agreed in principle, subject to further CCTV survey work which may inform potential remedial works or upgrades.

It is noted that at present, the applicant plans to restrict discharge from the site to 1.6l/s. This provides 30% betterment on the 1 in 2 year return period event. However, in accordance with WC's betterment policy, 30% betterment must be provided for all storm events including the 1 in 1 year return period event. The applicant will be required to demonstrate that the discharge rate can be further restricted to provide 30% on the 1 in 1 year return period event.

The sustainability statement mentions that rainwater re-use has not been considered due to the ongoing maintenance required for rainwater harvesting/recycling systems. The LLFA do not accept that rainwater re-use cannot be incorporated on a cost or maintenance basis and will require the applicant to reconsider this.

The applicant has explained that interception storage will be delivered, in accordance with the National Standards for SuDS, via permeable paving and the proposed basin. While we are satisfied that, in principle, the applicant has provided sufficient total area of interception SuDS, the applicant should clearly identify which impermeable areas drain to each interception SuDS feature. This will ensure that the impermeable area draining to each interception SuDS feature does not exceed the specified ratio.

The calculations provided by the applicant show that surcharging occurs within the upstream network during the 1 in 2 year return period event. We would not expect surcharging to occur (other than around storage or flow control devices) in low return period events. The applicant should re-consider this and provide updated calculations that demonstrate no surcharging up until higher return period events (i.e the 1 in 30 year return period event). Given that they are discharging to a highway drain, they should also provide calculations that show the effect of a surcharged outfall, to demonstrate that this would not lead to increased flood risk on site.

The drainage layout drawing shows that the southern side of the basin does not include suitable side slopes in line with CIRIA C753 guidance. The applicant should clarify the basin design by submitting cross-section drawings, along with an explanation of any constraints that have influenced this approach and how health and safety risks will be managed if the design is to be

retained. Cross-section drawings should also be provided for all other SuDS features, including the interception swale along the western site boundary.

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. Evidence of CCTV survey from the proposed connection point to the outfall point of the highway system.
2. Hydraulic modelling of the highway system and evidence that the proposed discharge would not cause surcharge/flooding/capacity issues downstream.
3. If surcharge/flooding/capacity issues occur, a schedule of works for repairs/upgrades to the downstream system, including hydraulic modelling evidence that the repairs/upgrades will provide sufficient capacity.
4. Written confirmation from WC Highways confirming right to connect to highway system at the proposed connection point.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant prior to approval:

1. In accordance with the Sewerage Sector Guidance (paragraph C.3.12) and Standard 1 of the National Standards for SuDS, the applicant is required to consider how surface water for re-use can be maximised, or provide justification as to why it cannot be achieved on this site.
2. 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 100 year return period storm events.
3. A drainage plan that clearly identifies which impermeable areas drain to each interception SuDS feature, to demonstrate that the impermeable area draining to each interception SuDS feature does not exceed the specified ratio.
4. Updated drainage calculations that demonstrate no surcharging of the upstream network in low return period storm events (i.e. not before the 1 in 30 year storm event).
5. Evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.
6. Cross section drawings of all proposed SuDS features, including:
 - o An explanation of any constraints that have influenced the design of the basin and how health and safety risks will be managed if the design is to be retained.
 - o The interception swale along the western site boundary
7. Detailed pre and post development exceedance routing plans that show how flows originating off site (to the west) will be impacted by the development.
8. Updated Finished Floor Level plan that shows adjacent ground levels.
9. 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.

The drainage team have the following conditions which need to be addressed by the applicant prior to occupation:

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.
- 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.

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.