

To:	Gen Collins	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2025/09484
Service Ref:	Drainage
Date:	03/07/2026

PROPOSAL

Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure.

SITE LOCATION

Land North of Swindon Road, Royal Wootton Bassett

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*
- *Covering Letter*
- *Flood Risk Assessment and Drainage Strategy*
- *Geo-Environmental Site Investigation Report*
- *Parameter Plan – Land Use*
- *Planning Statement*
- *Response to LLFA Holding Objection*

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.

It is noted the applicant has provided a geo-environmental site investigation report that has concluded surface water disposal via infiltration is not feasible at the site. The applicant has demonstrated adherence to the surface water disposal hierarchy as the method of disposal proposed is discharging surface water flows to an existing ditch in the east of the site, attenuating flows in SuDS across the site.

It should be noted that the LLFA support the proposals to install several SuDS features across the development in adherence to Standard 4, 5 & 6 of the National Standards for SuDS.

Previous Holding Objections (uploaded onto the portal 22nd January 2026):

Exceedance Flows: *“At this stage of the application & to remove the holding objection, the applicant must address this concern & outline how overland flow will be prevented from flowing off the southern boundary of the development and onto the highway”.*

The applicant has provided a revised overland exceedance flow drawing and has outlined in 2.1.10 of the 'Response to LLFA Holding Objection' that localised ground profiling in the south west of the site will ensure flows remain on site and will not contribute to modelled surface water flooding on the highway. The applicant has produced a section drawing in Figure 2/Appendix B to demonstrate proposed profiling.

As noted in the meeting between the applicant & the LLFA, at detailed design, the applicant will be required to demonstrate overland flow paths across the extent of the site (including rear gardens) and demonstrate how surface water will be safely managed where several overland flow arrows converge on the same point.

The LLFA support the applicant's suggestion of incorporating additional drainage features, particularly blue/green or source-control features to manage exceedance flows.

Wiltshire Council Betterment Strategy:

The applicant has demonstrated compliance with Wiltshire Council's Betterment Strategy in section 2.2.5 of the 'Response to LLFA Holding Objection' – with a proposed discharge rate of 7.5l/s for all storm events, providing a minimum of 30% betterment on each event.

Interception Storage ([Standard 2: management of everyday rainfall \(interception\)](#)):

The LLFA recognises the challenges of balancing compliance with several Standards as outlined by the applicant in section 2.3.5.

The LLFA can agree to manage interception calculations via condition as it is noted the applicant proposes several swales, permeable paving, and rain gardens which would contribute towards greater interception (Appendix 4). The LLFA would outline this is a pragmatic approach at outline stage, however at detailed design, the LLFA will require the applicant to demonstrate compliance with Standard 2.

Hydraulic Modelling & Drainage Layout Plans:

The applicant has provided Causeway Flow calculations to support the proposed surface water drainage strategy in Appendix D to demonstrate there is sufficient attenuation across the site to prevent flooding for all storm events up to and including the 1 in 100+45%cc event.

The LLFA notes in section 2.4.4 the applicant would prefer to provide a detailed surface water pipe network at the Reserved Matters stage to avoid potential abortive work. It is noted the applicant has demonstrated compliance with Wiltshire Council's Betterment Strategy and has proposed several source-control features across the extent of the development to support interception & attenuation.

The LLFA can agree to manage this point via a pre-commencement condition, however, will expect the applicant to comply fully with Wiltshire Council requirements, NPPF, PPG, Non Statutory Technical Standards for SuDS and the National Standards for SuDS.

SuDS Design: *"Detailed cross and long section drawings, and calculations, to demonstrate SuDS features (including the swale and attenuation basin) are designed appropriately".*

The applicant has provided sufficient information at this stage related to the swale & attenuation basin. The applicant should note at Reserved Matters, detailed cross & long section drawings and calculations will be required for all SuDS features across the extent of the site.

Catchment Transfer: *"Evidence to demonstrate there is no catchment transfer by discharging flows to the eastern watercourse. The applicant is required to demonstrate there is no increase to flood risk downstream as a result of the development".*

The applicant has undertaken a catchment analysis of the greenfield scenario at site. Figure 3 demonstrates that in the greenfield scenario, the eastern catchment (purple) falls and discharges to the ditch.

The western catchment (blue) drains southwards and falls towards the highway – potentially contributing to the modelled surface water flooding experience on the highway (Scalco analysis on right).

The applicant proposes to discharge surface water from the entire site to the ditch. The applicant has demonstrated there will not be catchment transfer as the attenuation provided onsite & restricted discharge rate of 7.5l/s provides betterment on the existing eastern catchment runoff towards the ditch in the greenfield scenario. Summarised calculations of this can be found in Table 2-5.

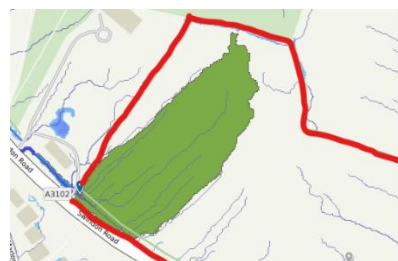


Figure 3: Topographical Catchments of Developable Area of Site

RECOMMENDATION: No Objection, Subject to Condition

1. **The applicant must provide further information related to the surface water drainage strategy:**
 - The applicant must provide a revised overland exceedance flow drawing demonstrating how flows across the extent of the development (including rear gardens) is safely managed. The applicant is required to demonstrate how surface water will be safely managed where several overland flow arrows converge on the same point in the current drawing (Appendix B). For reference, see the pink shading.



- Calculations to demonstrate that runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features (excluding attenuation ponds), in accordance with Standard 2 of the National Standards for SuDS.
- To demonstrate adherence to Standard 7 of the National Standards for SuDS, the applicant is required to provide a clearly labelled drainage layout plan showing the pipe network and proposed SuDS features. The plan should show any pipe node numbers referred to within the drainage calculations.
- To demonstrate adherence to Standard 3 of the National Standards for SuDS, the applicant is required to provide the hydraulic model, for each storm event, ensuring there is no modelled flooding in any storm event up to the 1 in 100 year event.
- Detailed cross & long section drawings and calculations, to demonstrate all SuDS features are designed appropriately & in accordance with relevant guidance.

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.*

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](#).

- *The applicant should note at a more detailed stage of the application, the drainage team will request further details regarding who is responsible for undertaking maintenance of the drainage network.*
- *If any features of the drainage network (including SuDS), are to be the responsibility of individual plot owners, the applicant must include the drainage strategy (including detailed drawings) & maintenance regime in the title deeds of the property.*
- *It is noted in section 6.10.8 that a detailed construction management plan will be provided at a more detailed stage of the application. The applicant must ensure the CMP demonstrates how surface water will be safely managed, mitigating flood risk to people & property. In addition, the applicant will be required to demonstrate how pollution to groundwater & watercourses will be mitigated throughout construction.*
- *It's noted there are two proposed alternative foul water strategies. The applicant must agree a strategy with Wessex Water as the foul sewerage undertaker for the region.*
- *It is noted in section 5.11.5 of the FRA the applicant has stated a sequential approach has been applied to the development. The LLFA would recommend the applicant completes a sequential test to clearly demonstrate the sequential approach has been applied to the council & local communities.*
- *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. If a value other than 0m³/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.*

As part of the Reserved Matters application, 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

- Existing greenfield runoff rates for the site.
- Post development runoff rates. These must also be in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Standard 2: interception

- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.

- 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.
- A schedule and plan of interception features must be provided, showing their location, type, and contributing catchment.

Standard 3: management of extreme rainfall and flooding

- A detailed topographical survey that clearly identifies the existing drainage features on the site as well as level contours to show overland flow routes.
- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- The drainage strategy does not increase flood risk as a result of catchment transfer.
- All proposed drainage features are outside flood zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.
- 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 30 year plus climate change rainfall event.
- 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 rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.
- Hydraulic Models should set the MADD factor / additional storage volume factor to $0\text{m}^3 / \text{ha}$ in order to prevent an overestimation of storage capacity in the proposed drainage network.
- 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.
- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753)

Standard 4: water quality

Evidence that the Environment Agency has been consulted and the level of risk and whether the site needs to be cleaned prior to re-use has been determined.

Standard 5: amenity

- The applicant must provide details of how SuDS features will deliver amenity benefits, including integration with public open space, accessibility, safety, and opportunities for recreation or education. Plans should clearly show how SuDS contribute to the quality and usability of the site for future occupants and the wider community. Note this may require additional engagement with the council's urban design and landscape officers.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks. A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

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

- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
- Groundwater level monitoring (taking into account seasonal variations).
- The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.
- If 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](#).

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 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.