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| <b>To:</b> | Audrey Lo | <b>From:</b> | Drainage Team |
|------------|-----------|--------------|---------------|

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|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2026/02895 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 01/07/2026    |

## PROPOSAL

Application for the approval of reserved matters relating to appearance, landscaping, scale and layout for a development of 95 dwellings, along with associated car parking, open space, landscaping, drainage and other infrastructure on the land west of Marlborough Road, Royal Wootton Bassett.

## SITE LOCATION

Land West of Marlborough Road, Royal Wootton Bassett

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required | <b>X</b> |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              |          |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- Application Form
- Site Location Plan
- Drainage Strategy Plan

## 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*

#### **Application for the approval of reserved matters following outline planning permission ref. PL/2024/08724 in relation to drainage.**

A drainage layout plan has been submitted as part of this application; however, no supporting technical information has been provided, such as hydraulic calculations, modelling outputs, detailed attenuation design, or evidence to demonstrate the performance of the proposed drainage system. Consequently, the submission does not provide the necessary information to demonstrate a safe & feasible drainage strategy compliant with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS.

## 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 detailed review of the drainage and flood risk aspects of the proposal:

- The applicant is required to provide a clear demonstration of whether the proposed drainage strategy delivers betterment over the current site conditions. In particular, the design should demonstrate a minimum 30% betterment against the greenfield runoff rates for the 1 in 1 year, 1 in 30 year and 1 in 100 year plus climate change events. As the submitted drainage strategy states that the impermeable areas used within the design are indicative, confirmation is required that the proposed attenuation volumes, discharge controls and drainage infrastructure remain suitable based on the final impermeable extents.
- It is noted the applicant has stated the proposed basin wet areas are intended to cater for the first 5mm of rainfall, however the applicant must provide interception storage calculations demonstrating 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 in accordance with the [National Standards for SuDS \(standard 2\)](#).
  - The applicant must outline how the proposed attenuation basins, filter drains and permeable paving contribute to interception storage.
  - As part of providing further information related to interception storage, the applicant must provide clarification on water reuse measures, and provide justification where such measures are not proposed as part of the drainage strategy. Noting the drainage disposal hierarchy, the applicant must outline why water reuse is not feasible at the site ([Standard 1: runoff destinations](#)).
- The applicant must provide an overland exceedance drawing identifying the exceedance routing on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate no adverse flood risk to existing & future people and property. This assessment must account for the proposed re-grading outlined by the applicant and demonstrate how flow paths across the extent of the development are safely managed in accordance with [Standard 3: management of extreme rainfall and flooding](#).
- The applicant must provide a detailed justification for the proposed culverting of the existing ditch/watercourse running through the centre of the site – the LLFA would emphasise that culverting is a last resort solution and should be avoided where possible. The applicant must provide:
  - clarification & explanation of why open channel solutions are not feasible
  - demonstration that in the 1 in 100yr + cc event can be safely conveyed by the culvert, with the culvert achieving D/4 freeboard and D/4 embedment
  - discussion as to why culverting has been proposed at this stage of the application process, rather than during the outline stage
- The applicant must provide details of water quality treatment measures within the drainage strategy and submit calculations demonstrating that a sufficient level of treatment is achieved to prevent pollution of the receiving waterbody and/or groundwater, in accordance with the CIRIA SuDS Manual (C753) and [Standard 4](#) of the National Standards for SuDS.
- The applicant must outline the proposed maintenance regime of all drainage & SuDS features, including who is responsible for maintenance, and the frequency of maintenance undertaken over the lifetime of the development.

- The applicant must provide a 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. ([Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

## INFORMATIVES

- 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).
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.
- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#). The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, the discharge rate from the site must be agreed with Wiltshire Council as part of agreeing the surface water drainage strategy for the site.
- 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.