

To:	Lucy Rutter-Dowd	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2026/01963
Service Ref:	Drainage
Date:	21/07/2026

PROPOSAL

Outline planning permission: All matters reserved for the residential development for up to 175 dwellings, associated works (including demolition), infrastructure, ancillary facilities, open space and landscaping. Construction of a new vehicular access off Coate Road and Windsor Drive.

SITE LOCATION

Land South of Coate Road, Devizes

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*
- *Covering Letter*
- *Flood Risk Assessment & Drainage Strategy – Part 1 & 2*
- *Ground Investigation Report*
- *Indicative Masterplan*
- *Planning Statement*
- *Site Location 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

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 LLFA's assessment relates to flood risk, water quantity, water quality and maintenance considerations. The proposed SuDS may also have implications for biodiversity, amenity, landscape, green infrastructure and placemaking objectives. Assessment of these matters falls outside the remit of the LLFA. The Local Planning Authority should seek and have regard to the advice of Wiltshire Council's Ecology, Landscape, urban design and other relevant specialist teams when considering these aspects of the proposal.

To resolve the holding objection, the applicant must provide the required permissions to demonstrate there is a feasible drainage strategy. The applicant must also demonstrate the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event. Currently the applicant has submitted calculations that represent an increased volume of flow into the canal post-development.

- Discharge Rate to the Kennet and Avon Canal:

AEP Event	Critical Duration (minutes)	Existing Discharge (l/s)	Proposed Discharge (l/s)	Difference (l/s)
1:2	60 S	170.0	171.3	+1.3 (+0.8%)
1:30 + 40% CC	60 S	629.8	630.5	+0.7 (+0.1%)
1:100 + 45% CC	60 S	782.7	782.1	-0.6 (-0.1%)

- Discharge Volume to the Kennet and Avon Canal

AEP Event	Duration (minutes)	Existing Discharge (m3)	Proposed Discharge (m3)	Difference (m3)
1:2	360 S	657.4	841.1	+183.7 (+28%)
1:30 + 40% CC	360 S	1987.6	2267.5	+279.9 (+14%)
1:100 + 45% CC	360 S	2656.7	2973.8	+317.1 (+12%)

At detailed design/reserved matters, the LLFA requires the applicant to propose further source-control SuDS across the extent of the site to intercept and attenuate surface water flows at source (Standard 2). The applicant is also required to demonstrate adherence to the surface water disposal hierarchy – notably that infiltration is utilised where possible (Standard 1). Additionally, revised section drawings, calculations & maintenance plans will be required.

Since the previous drainage response, the applicant has undertaken a CCTV survey of the manhole H8205 to the sewer outfall S7234, confirming the network is in good condition (Grade 1). It is noted as part of this survey a connectivity dye test was complete, confirming the highway drainage network discharges into the Kennet & Avon Canal. However the applicant must gain consent from Wessex Water and the Canal & River Trust to demonstrate this proposal is a feasible means of surface water disposal. We note in the greenfield state, flow is generally channels north over the site boundary, via an informal ditch network, into the canal – consequently there is no catchment transfer as a result of the development.

RECOMMENDATION:

Holding Objection for the following reasons:

1. National Standards for SuDS: [Standard 1: runoff destinations](#)
 - a) It is noted the applicant has provided a copy of correspondence with Wessex Water in the FRA & DS – Part 2, dated 10/03/2026 – the applicant must confirm Wessex Water have agreed to accept flows into the highways surface water sewer to demonstrate there is a viable drainage strategy.
 - b) To demonstrate there is a feasible drainage strategy, the applicant must demonstrate consent (in principle) from the Canal & Rivers Trust to discharge into the Kennet & Avon Canal.
 - c) In line with Wiltshire Council's Betterment Strategy ([Microsoft Word - Betterment Strategy June 2024 - FINAL v2](#)), the applicant must ensure the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.

Once the drainage objections have been resolved, the following information can be managed via condition:

1. Further information is required relating to the surface water drainage strategy:
 - a) While noting the applicant has provided an overland exceedance routing drawing, in accordance with Standard 3 of the National Standards for SuDS, the applicant must provide a drawing demonstrating the overland exceedance routes for flows through the site, and represent how exceedance in rear gardens & across open spaces will interact with the site (not just highways). The applicant will be required to demonstrate flow will not channel onto Windsor Drive, but will be intercepted and safely managed onsite, providing betterment on the pre-development scenario.
 - b) It is noted in Section 4 of the FRA the applicant discusses the contradictory guidance where permanently wet features do not provide interception but are required for biodiversity. Acknowledging this, the LLFA can agree to manage interception storage calculations at detailed design, but would emphasise that at detailed design calculations must demonstrate that the 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 (in line with paragraph 2.6 of the National Standards for SuDS).

The LLFA will require the applicant to demonstrate how rainwater harvesting can be utilised across the site and how SuDS features such as permeable paving and raingardens can provide interception in line with Standard 2.

- c) Infiltration testing has recorded an infiltration rate of 1×10^{-7} m/s. The applicant must enable infiltration where possible to demonstrate a hybrid strategy in adherence to paragraph 1.2 of the National Standards for SuDS – surface water disposal hierarchy.
- d) While noting the applicant has provided some example sections of SuDS features, at detailed design, the applicant must provide accurate cross & long sections details, including levels & freeboards, for all SuDS features proposed.
- e) At detailed design, the applicant must demonstrate the specific de-watering route from the Pond 3 discharge. While noting there are several drainage ditches adjacent to

Coate Road that flow towards the canal, the applicant must demonstrate for clarity the proposed flow route as several ditch flow arrows on the existing plans converge.

- f) Noting the applicant has provided water quality calculations using the Simple Index Method in Section 8 of the previously submitted FRA & DS, at detailed design the applicant must revise calculations to incorporate all SuDS features proposed as suggested in Section 6 of the revised FRA, and outline that a two-stage treatment train is proposed across the site.
- g) At detailed design, further source-control SuDS are required to demonstrate adherence to the National Standards for SuDS (Standards 3, 4, 5 & 6), and water butts to demonstrate rainwater harvesting will be utilised where possible. We note the applicant has stated that these proposals will be realised at detailed design.
- h) Noting the applicant has stated in section 5 of the FRA that “house floor levels will be generally set 150mm above the external levels”, the applicant must provide evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, 150mm above the adjacent SW drainage cover levels.
- i) While noting the applicant has provided an example maintenance regime, at detailed design the applicant must provide a maintenance strategy that outlines each maintenance activity, the frequency of each activity, and who is responsible for each activity.

If any maintenance activity will be the responsibility of individual plot owners, the applicant must ensure a copy of the agreed drainage strategy & associated maintenance regime are included in the title deeds of the property.

- j) The applicant must submit a construction management plan to demonstrate how flood risk to people & property, and pollution risk to groundwater & watercourses will be mitigated throughout construction.

INFORMATIVES

The applicant must gain consent to discharge foul sewage into the foul sewer system from the local sewerage undertaker.

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](#).

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 sets 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.