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| <b>To:</b> | Audrey Lo | <b>From:</b> | Rahul Dixit |
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| <b>Planning App Ref:</b> | PL/2026/04078 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 07/08/2026    |

## PROPOSAL

Approval of reserved matters (scale, layout, appearance and landscaping) pursuant to Outline Planning Permission 21/01004/OUT

## SITE LOCATION

Lottage Farm, Lottage Road, Aldbourne, Marlborough, SN8 2ED

## 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

- Flood Risk Assessment (21/01004/OUT) (Jan 2021)
- Flood Risk Assessment Addendum (21/01004/OUT) (July 2021)
- WC Drainage - Final Comments (21/01004/OUT) (Dec 2021)
- Drainage Technical Note (21/01004/OUT) (Nov 2021)
- Drainage Statement – additional (21/01004/OUT) (Dec 2021)
- Drainage Strategy (PL/2026/04078) (April 2026)
- Flood Exceedance Routes (PL/2026/04078) (April 2026)

## 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*

(LLFA) notes that the drainage strategy submitted by TUMU is based on the Flood Risk Assessment and Drainage Strategy approved under application ref. 21/01004/OUT. Whilst this is acknowledged, changes to Wiltshire Council's drainage requirements and updates to the National Standards for SuDS have occurred since outline permission was granted on 19 September 2024. As such, the details submitted in support of the current Reserved Matters Application have been reviewed against the current applicable standards and guidance.

The submitted Drainage Strategy proposes the disposal of surface water runoff via infiltration through permeable paving. The infiltration strategy is supported by BRE 365 infiltration testing undertaken across two separate site investigations completed by C J Associates (2017) and Earth Environmental & Geotechnical (2020). The reported infiltration rates range between  $2.48 \times 10^{-6}$  m/s and  $3.16 \times 10^{-4}$  m/s, indicating variable infiltration potential across the site.

Despite this, the applicant is required to submit further information as the current submission does not demonstrate compliance with half drain down time requirements. The applicant must also demonstrate that there is 1m separation between the base of all infiltration features and the recorded peak groundwater level.

With respect to groundwater conditions, monitoring undertaken by Earth Environmental & Geotechnical in August 2020 did not record groundwater within the investigated depths at the time of monitoring. However, subsequent monitoring undertaken between February and April 2021 identified groundwater within two boreholes at depths of approximately 1.65 m and 1.50m below existing ground level respectively.

The LLFA require additional groundwater monitoring to be undertaken, particularly October to April, to accurately record peak groundwater levels at the site.

While the LLFA notes the local flood warden believes flood risk primarily originates from groundwater, the LLFA suggests local flood risk originates from a combination of groundwater and surface water flooding. The applicant will be required to demonstrate that flooding from all sources is safely managed, without increasing flood risk elsewhere, at Outline design.

The applicant is required to provide further information related to the raising of the site, notably how overland flows will be impacted, the proposed gradient of permeable paving and whether flood risk is increased to adjacent land as a result of the land raising.

The applicant has submitted a tree pit section in support of this application. However, it is not clear whether this forms part of the proposed drainage strategy. The applicant should confirm if tree pits and other blue/green SuDS are proposed as part of the drainage strategy for the site.

## RECOMMENDATION

### **Holding objection as further information required**

At this stage, further information is required to enable a detailed review of the drainage and flood risk aspects of the proposal:

- The applicant must undertake additional groundwater monitoring to demonstrate an understanding of seasonal variation in levels. Currently the applicant has submitted February 21 to April 21 (Table 4), however the groundwater level is constantly falling, suggesting the peak may have been earlier across the winter months. Consequently, the applicant must submit groundwater monitoring between October 2026 and April 2026, undertaken to expected industry standards.
- It is noted the permeable pavement does not comply with Paragraph 3.16 of the National Standards for SuDS that requires a maximum half drain-down time of 24 hours. Whilst we note the applicant has provided additional storage volume set out in section 2.5 of the Drainage Strategy, the submitted calculations indicate half drain-down times of up to 92.4 hours.

The applicant must provide a revised design, including details and calculations, that demonstrate compliance with Wiltshire Council Soakaway Policy & the National Standards for SuDS. Alternatively, the applicant must provide calculations to demonstrate that this existing design has sufficient storage volume to manage the 1 in 30 year event plus climate change, then an additional 1 in 10 year event. The applicant should note that the LLFA will not accept a drain down time of 92.4 hours.

- The applicant must provide calculations 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 accordance with Standard 2 of the National Standards for SuDS.
- The Flood Exceedance Sheet 1 and Section B-B outlines surface water flow will be directed onto the highway. The applicant must demonstrate how flow will be managed onsite, without increasing flow onto the highway.
- It is noted the applicant has proposed raising the site ground level. The applicant must submit a pre-development and post-development overland flow plan to demonstrate how the raised ground level at the site will impact flow paths. The LLFA are concerned the ground raising may divert flows elsewhere, or create a bund which dams flows. The applicant must provide this information to demonstrate a clear understanding of how the site raising will interact with adjacent land and existing flow paths.
- Observing Appendix D, several permeable paving features are designed with significant gradients. The LLFA are concerned surface water will runoff the gradient prior to interception into the storage feature. The applicant must provide details demonstrating compliance with minimum gradients requirements of CIRIA C753F, and outline how flow will be intercepted and stored prior to runoff.
- The applicant must confirm if the ditch adjacent to the highway will be culverted to enable vehicular access to the site. If culverting is proposed, the applicant will be required to submit detailed calculations, sizing and cross & long sections to demonstrate the culvert is designed in accordance with industry standards. Land Drainage Consent will also be required if construction will be undertaken within 8m of the ordinary watercourse.

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

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, Non-Statutory Technical Standards for SuDS and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.**

In order to discharge the above drainage, condition the following additional information must be provided:

- The applicant must justify why further blue/green, source-control SuDS are not considered at this site, with particular regard to rainwater harvesting (RWH). Further source-control SuDS would contribute to several multi-faceted benefits, notably in water quality and quantity, interception and amenity. This is required by Standard 1 of the National Standards for SuDS.
- We note the applicant's design complies with the Simple Index Method, however the applicant should incorporate SuDS source control measures to manage surface water and increase the water quality treatment train to demonstrate further compliance with [Standard 4](#) of the National Standards for Sustainable Drainage Systems,
- At detailed design, the applicant must provide a revised overland exceedance flow drawing to demonstrate flow paths in rear gardens & open spaces, not just the highway. The revised plans must demonstrate that overland flows will not increase flood risk to people or property elsewhere, including neighbouring property, in the event of network blockages or intense rainfall. The applicant must provide hatching to demonstrate where temporary ponding is expected during exceedance events, including flood depths, to demonstrate the drainage strategy safely mitigates flood risk to people & property.
- We note the applicant has stated in a section of permeable paving that groundwater was present 0.5m below the base of the soakaway. The applicant must demonstrate the highest recorded groundwater level is at least 1m below the proposed soakaway in accordance with the National Standards for SuDS paragraph 4.16.1.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at 150 mm above the SW drainage cover levels.
- The applicant must submit a construction management plan demonstrating how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction.

## INFORMATIVES

- Discharge consent should be provided that the proposal is acceptable to the relevant authorities, including the Environment Agency and the Local Planning Authority
- Any features of the drainage strategy that are the responsibility of an individual plot owner must be clearly recorded in the title deeds of the property, with an accompanying drainage strategy drawing and the agreed maintenance regime.
- 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 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.