

To:	Steven Sims	From:	James Playfair
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Planning App Ref:	PL/2026/02472
Service Ref:	Drainage
Date:	25 August 2026

PROPOSAL

Approval of reserved matters

Details of Landscaping, Appearance, Layout and Scale pursuant to the outline planning permission PL/2023/01880 approved at appeal (APP/Y3940/W/24/3352160)

SITE LOCATION

Land Rear of 117, High Street, Dilton Marsh

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

- Drainage Layout (P05)
- Drainage Technical note (P04)
- Exceedance flow plan (P05)
- Impermeable area (Revisions covering letter)

ASSESSMENT OF THE PROPOSAL

Context

In May 2026, the LLFA proposed a Holding Objection until the following information was supplied, reviewed and accepted:

Standard 1: runoff destinations

- As part of detailed design works, it must be reviewed whether a rainwater harvesting system can be effectively incorporated to the proposed plots.
- 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. i.e. use of water Butts, tree pits, raingardens permeable paving and attenuation basins
- 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 100year return period storm events in accordance with Wiltshire Council's betterment policy update (30%), which can be found [here](#).
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Evidence that there is sufficient freeboard (300mm minimum) above the critical 1 in 100yr + climate change storm event.

Standard 3: management of extreme rainfall and flooding

- 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.
- 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.
- 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 (45%) rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Exceedance routes that minimise the risks to people and property especially where water courses have been curtailed

Standard 3: management of extreme rainfall and flooding

- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.

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. The plan must show how water will move between ponds
- A plan showing the cross sections and design of any attenuation pond and raingarden and its components

In addition, the LLFA required responses to the following points:

1. Section 3.7 states that as part of the detailed design, rainwater harvesting should be considered. This should not be deferred until later due to the impact this will have on the overall drainage strategy for the site.
2. Section 3.16 – States that waterbutts will be provided but it's also stated in Section 3.7 that water butts should be used as a minimum. This currently is inconclusive as to what the applicant is proposing to provide in the drainage strategy.
3. Section 3.20 – We require further evidence that all impermeable area will drain to a “permeable” feature. Specifically, would like to see how the runoff from the roads is explicitly managed
4. Section 3.21 - A climate change uplift of 45% is the current standard – the climate change allowance will therefore need to be updated within the calculations.
5. Submitted calculations show additional attenuation storage at 20m³/ha – this must be set to 0m³/ha or additional justification provided
6. Need cross sections & long sections of the attenuation features – Details are required as to how water moves from one basin to the next
7. If any trees are to be newly planted then they should be designed as SuDS tree pits, with appropriate inlets etc from the internal roads or justifiable reasons provided why they cannot
8. Existing watercourse that will be curtailed (nr S8) will require formal LDC from the LLFA (as will the construction of outfalls). How has overland exceedance in this area been considered?
9. Raingardens shown next to proposed highways gullies and not shown with any connection to the drainage system – details of raingardens (incl cross sections and long sections) to be provided to LLFA.
10. Further details are required as to what is the large triangular basin is.

Assessment

The covering letter summarises the changes referring to the SW drainage strategy as follows:

LLFA	Drainage — climate change	Update calcs from 40% to 45% - - The calculation has been updated to 45%, with 10% urban creep.
LLFA	Drainage — MADD factor	Set to 0 m ³ /ha or justify - Additional storage is already set to 0 m ³ /ha.
LLFA	Drainage — betterment	Demonstrate 30% (not 20%) for storms 1-in-1 to 1-in-100 - The 30% betterment incorporated.
LLFA	Rainwater harvesting	Confirm at design stage — Sections 3.7 vs 3.16 contradictory -The requirements under Sections 3.7 and 3.16 have already been addressed as part of the technical note.
LLFA	Drainage details	Cross / long sections of basins and rain gardens; provided for basins, rain gardens now omitted

Standard 1: runoff destinations

It is proposed for all properties to incorporate rainwater butts for rainwater harvesting and reuse

The strategy includes attenuation basins, swales, attenuation tanks and rainwater butts and water quality calculations have been provided.

Standard 3: management of extreme rainfall and flooding

The note explicitly states impermeable area is 1.00 ha and hydraulic calculations use **Cv = 1** in accordance with Wiltshire requirements

The report explicitly states hydraulic calculations use MADD Factor = 0 m³/ha and highlights this was required by Wiltshire Council

A dedicated Exceedance Flow Plan is included and the report explains routing of exceedance flows via roads towards attenuation basins and ditches

The report states that 10% additional area (urban creep) has been included for the 100-year event and calculations reference the 100-year +45% CC +10% urban creep scenario

The drainage layout identifies manholes, node references (S1-S26), tanks, basins, flow controls, headwalls and pipe networks corresponding to the hydraulic model.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

The drainage layout shows interconnections between basins via pipes, headwalls, orifice controls and flow controls

Pond dimensions, volumes, depths and side slopes are provided on the drainage layout. However, no dedicated cross-sections are included and no raingarden details are shown.

The covering letter states that raingardens have been removed but it is evident that that the strategy is not reliant on these features and still is acceptable, however we are disappointed that these source control features have been removed seemingly without reason

RECOMMENDATION

No objection subject to the following conditions

[Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)

Cross sections & long sections for the basins and swales

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.