

To:	Gary Collins	From:	Drainage Team
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Planning App Ref:	PL/2026/01555
Service Ref:	Drainage
Date:	24/07/2026

PROPOSAL

A reserved matters application (appearance, layout, scale and landscaping) for 229 dwellings and associated infrastructure – Reserved Matters pursuant to Outline permission PL/2023/11188

SITE LOCATION

Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS

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 for Phase 1(MAR 2026)
- Design and Access Statement (MAR 2026)
- Drainage Statement (MAR 2026)
- Network A - Hydraulic Calculations (MAR 2026)
- Network B - Hydraulic Calculations (MAR 2026)
- Network C - Hydraulic Calculations (MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 1(MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 2(MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 3(MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 4(MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 5(MAR 2026)
- Phase 1 Site Wide Drainage - Sheet 6(MAR 2026)
- Sewer Construction Details (MAR 2026)
- Site Layout (Sheet 1 of 2) (MAR 2026)
- Site Layout (Sheet 2 of 2) (MAR 2026)
- Site Location Plan (MAR 2026)
- Storm Water Catchment Plan (MAR 2026)
- SuDS standard details (JUL 2026)
- Phase 1 Site wide levels -1 (JUL 2026)
- Phase 1 Site wide levels -2 (JUL 2026)
- Phase 1 Site wide levels -3 (JUL 2026)
- Phase 1 Site wide levels -4 (JUL 2026)
- Phase 1 Site wide levels -5 (JUL 2026)

- Phase 1 Site wide levels – 6 (JUL 2026)
- Site layout (Combined) (JUL 2026)
- Basin section - Basin 1 (JUL 2026)
- Basin section – Basin 2 (JUL 2026)
- Basin section – Basin 3 (JUL 2026)
- Bioretention verge details (JUL 2026)
- Covering letter – Revised plans (JUL 2026)
- Drainage Technical note (JUL 2026)
- Exceedance plan -1 (JUL 2026)
- Exceedance plan -2 (JUL 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

We acknowledge that the applicant has submitted additional drainage information in response to the LLFA previous consultation comments, including a Drainage Technical Note, Storm Water Catchment Plan, SuDS Standard Details and Exceedance Flow Plans.

The additional information satisfactorily addresses the LLFA's previous concerns regarding catchment extents. The applicant has clarified the area of the site that naturally drains in a north-westerly direction and has demonstrated that directing this area towards the proposed drainage network would result in a negligible increase in discharge, which when considered in combination with the inherent model accuracy, would be unlikely to result in an increase in discharge elsewhere.

The applicant has also provided further information regarding the proposed SuDS management train. The submitted Technical Note confirms that the drainage strategy incorporates permeable paving, bioretention verges, swales/conveyance channels and detention basins, providing source control, conveyance and attenuation throughout the development.

The applicant has provided overland exceedance route drawings demonstrating how exceedance flows will be conveyed through the development. It is understood that finished floor levels will be set above surrounding ground levels, and the submitted information demonstrates that exceedance flows will be directed away from buildings and managed through highways, open space and the wider site layout. On this basis, the LLFA is satisfied that the development can achieve compliance with the National Standards for SuDS in respect of managing exceedance events.

Furthermore, the applicant has confirmed that permeable paving and bioretention (raingarden) features form part of the proposed SuDS management train; however, these features are not currently represented within the submitted hydraulic modelling. As such, the drainage performance demonstrated by the model is considered conservative, with the inclusion of these source control features expected to provide additional attenuation, interception and water quality benefits beyond those currently shown. Volumetric interception storage requirements were discussed and agreed in principle with the applicant during a meeting held on 5 June 2026. The applicant has subsequently been requested to provide the supporting interception storage spreadsheet to enable final verification and sign-off by the LLFA. Detailed matters relating to water quality treatment, attenuation basin freeboard, construction phase drainage management and long-term maintenance arrangements can be secured through the discharge of the drainage conditions attached to the outline planning permission.

RECOMMENDATION

No objection subject to the following conditions

1. **No development shall take place until a detailed surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG 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 has provided overland exceedance drawings demonstrating flow along the highways; however, the applicant must provide further drawings demonstrating all flow paths across the site, including rear gardens & open space to demonstrate that flood risk is appropriately mitigated. In the event of drainage network failure, the applicant must provide confirmation of the likely exceedance flow extents, temporary ponding locations and maximum anticipated ponding depths.
- Detailed attenuation basin design information demonstrating that all attenuation features provide a minimum freeboard of 300mm above the 1 in 100 year plus climate change design water level.
- A Construction Surface Water Management Plan detailing temporary drainage arrangements, pollution prevention measures and sediment control measures during construction.
- A Management and Maintenance Plan for all SuDS features, including details of ownership, management responsibilities, funding arrangements, inspection frequencies and maintenance schedules for the lifetime of the development. ([Standard 7 - National standards for SuDS](#))

INFORMATIVES

- 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.
- 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](#).

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.