

To:	Development Management	From:	Drainage Team (Aayushi Kochar)
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Planning App Ref:	PL/2026/02930
Service Ref:	Drainage
Date:	27/08/2026

PROPOSAL

Outline application

Residential development for up to 40 dwellings, associated works, infrastructure, ancillary facilities, open space and landscaping. Construction of a new vehicular access off Windsor Drive

SITE LOCATION

Land off Windsor Drive, 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*
- *Design and Access Statement*
- *Flood Risk Assessment & Drainage Strategy*
- *Ground Investigation Report*
- *Notices and Letters*
- *Planning Statement*
- *Site Location Plan*
- *Site Survey*
- *Waste Minimisation and Management 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 site lies within Flood Zone 1 and is therefore at low risk of fluvial flooding. The submitted Flood Risk Assessment concludes that the proposed development can be safely accommodated without increasing flood risk elsewhere. Flood risk from surface water, groundwater, sewers and other sources has been assessed and is considered acceptable.

Discharge location

Ground investigation undertaken across the site indicates that infiltration drainage is not feasible due to the low permeability of the underlying chalk and clay subsoils. As a result, soakaways are not proposed and surface water runoff will instead be managed through a Sustainable Drainage System (SuDS) and discharged at a controlled rate to the existing highway drainage system along Windsor Drive. Connection to the highway drainage system is not encouraged and other methods of surface water disposal should be considered first.

Discharge rate

The drainage strategy incorporates an attenuation pond located within the northern part of the site, designed to provide storage for the 1 in 100-year storm event, including allowances for 45% climate change and 10% urban creep.

The applicant is proposing to restrict surface water discharge rates to Q_{bar} . It is accepted that this would provide the required 30% betterment for higher return period events, but the applicant must demonstrate that 30% betterment can be achieved in all return period events, including the 1 in 1 year storm event.

Interception storage

The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS. The site layout should be updated to demonstrate the inclusion and arrangement of interception storage features.

Overland flows

The applicant has submitted plans indicating that overland flows enter the site from the south, and that the applicant plans to introduce interception swales to divert these flows around the development. The applicant should provide further detail regarding this arrangement. Where these swales connect into the proposed attenuation basin, the applicant must demonstrate that the basin has been sized to accommodate these flows, plus flows originating on the development itself.

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 proper review of the drainage and flood risk aspects of the proposal:

- Connection to the highway drainage system is not encouraged and other methods of surface water disposal should be considered first. Connection to highway drainage should only be seen as a last resort after exhausting all other options. The following information is required in support of any proposal to connect surface water into a highway drain:
 - CCTV survey from the proposed connection point to the outfall point of that system (even if it's 1km+ away).
 - Hydraulic modelling of the system, and evidence that the proposed discharge would not cause surcharge/flooding/capacity issues downstream.
 - If surcharge/flooding/capacity issues occur, a schedule of works for repairs/upgrades to the downstream system, including hydraulic modelling evidence that the repairs/upgrades will provide sufficient capacity.
- It is noted that the applicant plans to restrict discharge rates from the site to the greenfield Qbar rate (corresponding to the 1 in 2.33year rainfall event) for all events up to the 1 in 100year + climate change storm; it is acknowledged that for the higher return period rainfall events this will provide betterment, however this will not provide the required level of betterment for lower return period events (such as the 1 in 1 year rainfall event). Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 30% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6-hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."

The applicant will be required to resubmit 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.

- The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS. The site layout should be updated to demonstrate the inclusion and arrangement of interception storage features.
- Clarify design of proposed interception swales, including their outfall locations and any additional storage requirements.
- Exceedance routes that minimise the risks to people and property.

When the holding objection has been lifted, the LLFA are happy that the following information can be managed by condition, as part of subsequent planning applications:

- Calculations that demonstrate that:
 - The 1 in 30 year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.

- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- Clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.
- 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.

INFORMATIVES

- 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.
- All new drainage will need to comply with Building Regulations Part H.

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.