

To:	Isobella Wise	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2026/02966
Service Ref:	Drainage
Date:	26/08/2026

PROPOSAL

Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common

SITE LOCATION

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
- Planning Statement
- Illustrative Masterplan
- Geo-Environmental Site Investigation
- Appendix 5.2 Geo-Environmental Desk Study Part 1
- Flood Risk Assessment & Drainage Strategy

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.

It is noted BRE-365 infiltration testing was unsuccessful at the site (5.2 of Geo-Environmental Site Investigation). Consequently, the applicant proposes to discharge surface water into several ordinary watercourses. The drainage network proposed consists of three surface water networks, each with a basin and flow control device (5.13 of FRA & DS). The applicant has provided an existing catchment plan in Appendix H of the FRA & DS; however further evidence will be required to demonstrate there is no catchment transfer post-development.

It is noted several areas of the site are at high groundwater flood risk and section 4.9 of the Geo-Environmental Site Investigation records groundwater consistently rising from September to November, with perched groundwater recorded at 0.72mBGL. At detailed design, the applicant will be required to demonstrate that the recorded groundwater levels have been considered in the drainage design.

The applicant has proposed rainwater harvesting, although further detail will be required at the next stage of design. Similarly, the applicant has committed to providing interception storage in section 5.18 of the FRA & DS – detailed calculations demonstrating compliance will be provided at the detailed stage of design. The applicant is encouraged to provide rainwater harvesting, blue/green & source-control SuDS wherever possible across the extent of the development.

RECOMMENDATION: No objection subject to the following conditions:

1. **No development shall take place until a 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**
 - a) The applicant must demonstrate there is no catchment transfer by providing a post-development catchment plan, enabling comparison with the pre-development greenfield catchment plan in Appendix H of the FRA & DS.
 - b) In section 5.14 of the FRA & DS the applicant has stated runoff from roofs will be collected and reused for irrigation. While the LLFA encourages rainwater harvesting in accordance with [Standard 1](#), the applicant must provide detail of how this will be operated – notably will each plot have a water butt, or will this be a multi-plot strategy controlled by the management company. The applicant will be required to demonstrate how runoff from the roofs will be disposed of in the event of water butts exceeding to prevent flood risk to individual properties.
 - c) In section 5.18 of the FRA & DS the applicant has stated the first 5mm of surface water will be intercepted & stored in accordance with [Standard 2](#) through attenuation basins permeable paving, rainwater plants and raingardens (para 5.19). At detailed design, calculations to demonstrate compliance with [Standard 2](#) (para 2.6) will be required.
 - d) Observing the mapped surface water flood risk, the applicant must provide a copy of the drainage strategy drawing overlaying the flood risk to demonstrate the drainage infrastructure, notably basin 2, does not become inundated with flood volumes.
 - e) To demonstrate compliance with [Standard 3](#), the applicant must provide a drawing outlining the overland exceedance routes for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event. The submitted drawings must show flow routes along the highway, rear gardens & landscaped areas to demonstrate flow will be safely managed without increasing flood risk elsewhere.
 - f) The applicant must provide revised simple index method calculations to reflect the proposed drainage strategy and demonstrate there is a minimum two-stage treatment train to mitigate pollution risk to groundwater & watercourses in line with [Standard 4](#).
 - g) The applicant must provide detailed calculations that demonstrate the sizing of each attenuation/SuDS feature, the freeboard and a cross section drawing of each feature. In doing so, the applicant must demonstrate that there is no flooding in the 1 in 30 year event for all proposed features.
 - h) The applicant must provide a detailed maintenance strategy outlining the frequency of each activity undertaken, and who is responsible for completing each activity.
 - i) The applicant must provide evidence that all finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
 - j) The applicant must submit a construction management plan to demonstrate how flood risk to people & property, and pollution risk to groundwater & watercourses are mitigated throughout construction.

2. 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.

INFORMATIVES

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 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.