

To:	Victoria Blackmore	From:	Drainage team
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Planning App Ref:	PL/2026/04600
Service Ref:	Drainage
Date:	04/09/2026

PROPOSAL

Approval of details reserved by a condition

Discharge of Conditions 5 (Construction and Environmental Management Plan), 7 (Arboricultural Method Statement), 8 (Scheme for the Discharge of Surface Water) & 9 (Scheme for the Disposal of Foul Water) of Planning Application 20/03876/OUT

SITE LOCATION

Land East of Church View, Sutton Benger, SN15 4RR

APPLICATION DOCUMENTS REVIEWED

- 1 in 2yr
- 1 in 30yr
- 1 in 100yr +40%
- 6455-CHVIE-ICS-01-XX-DR-C-0300-S4-P02_Surface Finishes
- 6455-CHVIE-ICS-01-XX-DR-C-0400-S4-P01_Details Sht 1
- 6455-CHVIE-ICS-01-XX-DR-C-0401-S4-P01_Details Sht 2
- 6455-CHVIE-ICS-01-XX-DR-C-0501-S4-P01_Section 104 Agreement Plan
- 6455-CHVIE-ICS-01-XX-DR-C-0502-S4-P01_Section 104 Agreement Long Sections
- 6455-CHVIE-ICS-01-XX-DR-C-0503-S4-P01_Section 104 Details
- 6455-CHVIE-ICS-XX-RP-C-07.001 - SUDS Maintenance Guide
- 6455-CHVIE-ICS-XX-RP-C-07.002 - Drainage Strategy
- PL 2026 04600 - SW Drainage Response Issue (Issued on 20th August 2026)
- Sutton Benger - CEMP Rev B - August 2026

ASSESSMENT OF THE PROPOSAL

Context

The LLFA had the following conditions for which information was required before these could be discharged

8. Apart from the construction of the access or the excavation of foundation trenches, no development hereby permitted shall commence until a scheme for the discharge of surface water from the site (including surface water from the access/driveways) has been submitted to and approved in writing by the local planning authority. The details shall include proposed sustainable drainage measures, management of overland flow routes information and a maintenance schedule for drainage systems for the lifetime of the development and arrangements for the adoption by any public or statutory undertaker and any other arrangements to secure operation of the scheme throughout its lifetime. The scheme shall be implemented in accordance with the approved details prior to the occupation of the first dwelling and shall be managed in accordance with the approved details thereafter.

Conditions 5, 7 & 9 do not require comments from the LLFA and consequently have not been discussed as part of this drainage consultation.

Assessment

The applicant has submitted additional documents. For discharge of surface water, a piped system is identified which runs parallel along the northern side of B4069, discharges into an ordinary watercourse to the east of the site, which then outfalls into the River Avon. The flow from site are still being attenuated down to 3.2l/s via the use of hydro brake flow control valve and the storage to hold storm events up to and including 1 in 100yr plus 40% event are held within oversized pipework below the roads with additional storage provided within cellular storage tanks, tanked permeable paving to the car parking areas and a 200sqm detention basin at the front of the site. A new gravity fed piped foul drainage network is proposed, which serves the new residential units, and connects into the Wessex Water public sewer which cross the site.

The applicant has mentioned that these details have been provided 6455-CHVIE-ICS-01-XX-DRC-0200 and 6455-CHVIEICS-01-XX-DR-C-0600, however, these drawing have not been submitted.

The detailed drainage calculations have been provided. However, the calculations use MADD factor of 20m³/ha, which indicates additional storage. The detailed drainage calculation must follow the Wiltshire Council policy which states that Hydraulic Models should set the MADD factor / additional storage volume factor to 0m³ / ha to prevent an overestimation of storage capacity in the proposed drainage network.

The CEMP Rev B document now provides mitigations measures for contaminated surface water runoff.

Accordingly, further information is required before Condition 8 can be discharged

RECOMMENDATION

Condition 8 cannot be discharged until the following information is submitted and accepted by the LLFA:

- The applicant shall provide evidence demonstrating that the proposed discharge rates achieve the minimum 20% betterment over greenfield runoff rates agreed at outline stage. Whilst compliance has been demonstrated for the higher return period events, no evidence has been provided to show that the required betterment is achieved for the lower return period storm events (e.g. Q1/Q2). Updated hydraulic calculations should therefore be submitted to confirm compliance with the approved runoff rate restrictions and drainage strategy.
- The submitted hydraulic model shall be revised to represent the attenuation basin as an offline feature, in accordance with the proposed drainage layout shown on the drawings. Updated hydraulic calculations and summary outputs shall be provided to demonstrate that the model accurately reflects the proposed design and that the drainage system operates without flooding during the 1 in 1, 1 in 30 and 1 in 100-year rainfall events, including the appropriate climate change allowance.
- 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. If a value other than 0m³/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.
- The applicant must submit a post-development exceedance flow plan demonstrating how flows will be safely managed during events exceeding the design standard, ensuring there is no increased risk to people & property and highways.
- The applicant must provide details of water quality treatment measures within the drainage strategy and submit calculations demonstrating that a sufficient level of treatment is achieved to prevent pollution of the receiving waterbody and/or groundwater, in accordance with the CIRIA SuDS Manual (C753) and [Standard 4](#) of the National Standards for SuDS.

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](#).

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