

To:	Audrey Lo	From:	Drainage Team
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Planning App Ref:	PL/2026/02895
Service Ref:	Drainage
Date:	09/09/2026

PROPOSAL

Approval of reserved matters

Application for the approval of reserved matters relating to appearance, landscaping, scale and layout for a development of 95 dwellings, along with associated car parking, open space, landscaping, drainage and other infrastructure on the land west of Marlborough Road, Royal Wootton Bassett.

SITE LOCATION

Land West of Marlborough Road, Royal Wootton Bassett

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 (*July 2026*)
- Site Location Plan (*July 2026*)
- Drainage Strategy Plan (*July 2026*)
- Technical Note (*Sep 2026*)
- Surface water exceedance plan (*Sep 2026*)
- Planning layout (*Sep 2026*)
- Drainage Strategy (*Sep 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

The applicant has submitted additional information in support of the proposed surface water drainage strategy, including hydraulic calculations, interception storage assessments, water quality information, maintenance proposals, a Surface Water Exceedance Plan and a preliminary finished floor level strategy. The information provided demonstrates progress in addressing a number of the concerns raised within the previous LLFA consultation response.

However, the submitted exceedance information does not sufficiently demonstrate that exceedance flows can be safely managed across the entire development site. In particular, further clarification is required to demonstrate that exceedance flows will not discharge onto the adjacent highway and that proposed exceedance routing through landscaped and rear garden areas will not result in flood risk to property, infrastructure, or third parties. Additional details are therefore required regarding exceedance flow pathways, flow depths, and management measures during events exceeding the design capacity of the drainage system.

Furthermore, limited information has been provided regarding water reuse opportunities, and detailed culvert design and construction phase drainage information have not been submitted, these matters relate to the detailed design and implementation stages of the development and can be appropriately secured through planning conditions.

Accordingly, the previous holding objection can be withdrawn and the LLFA raises No Objection Subject to Conditions.

RECOMMENDATION

No objection subject to 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.**

In order to discharge the above drainage condition the following additional information must be provided:

- The applicant has provided additional information regarding the proposed culverted section of watercourse and confirmed that further survey work and detailed engineering design will be undertaken during the detailed design stage. Prior to construction of the proposed watercourse crossing, the applicant must provide.
 - clarification & explanation of why open channel solutions are not feasible
 - demonstration that in the 1 in 100yr + cc event can be safely conveyed by the culvert, with the culvert achieving D/4 freeboard and D/4 embedment
 - discussion as to why culverting has been proposed at this stage of the application process, rather than during the outline stage
- The applicant shall demonstrate that rainwater harvesting measures have been incorporated within the development, with water butts provided as a minimum on all residential downpipes where practicable in accordance with the drainage hierarchy ([Standard 1: runoff destinations](#)).
- A revised surface water exceedance plan demonstrating that exceedance flows arising from events above the design standard can be safely conveyed through the site without directing water onto the public highway and without creating unacceptable flood risk within rear gardens, public open space, property curtilages, or neighbouring land. The submission should include flow routes, indicative flow depths and confirmation of exceedance storage locations. (refer to [Standard 3: management of extreme rainfall and flooding](#)).
- The applicant must provide 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, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. ([Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

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 fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.
- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#). The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, the discharge rate from the site must be agreed with Wiltshire Council as part of agreeing the surface water drainage strategy for the site.
- 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.