

To:	Isobella Wise	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/04618
Service Ref:	Drainage
Date:	17/09/2026

PROPOSAL

Removal/variation of conditions

Variation of conditions 2, 3, 4, 5, 6, 7, 8, 13 of PL/2024/01979 (allowed Planning Appeal APP/Y3940/W/24/3352756) to allow changes in the development design and to amend the pre-commencement conditions to compliance only.

SITE LOCATION

Land Opposite Nos 6 And 7, Silver Street, Gastard SN13 9PY

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Condition 2 - Site Boundary Location Plan
- Condition 3 - Geo-Environmental Report Phase I and II
- Condition 4 - Drainage Strategy & Flood Risk Assessment
- Condition 5 - Construction Management Plan
- Condition 7,8 & 13 - Proposed Site Plan
- PL.2024.01979 Appeal - decision
- Planning Statement

ASSESSMENT OF THE PROPOSAL

Context

In 2025 The LLFA had the following conditions (Condition 4 – Surface water Drainage and Condition 5 – Construction Management Plan) for which information was required before these could be discharged

4. No development shall commence on site until a scheme for the discharge of surface water from the site has been submitted to and approved in writing by the local planning authority. The scheme shall be informed by a site specific Flood Risk Assessment (FRA) and incorporate sustainable drainage details including any off-site works and any permissions for connections to private drainage systems/land drainage consent.
5. No development shall take place until a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The approved Construction Management Plan shall be adhered to throughout the construction period for the development.

Assessment

The applicant has ruled out infiltration as a surface water disposal method due to the variable underlying geological conditions.

The applicant has proposed to limit outfall discharge to 2 L/s, although the calculated greenfield QBAR rate is 0.6 L/s, citing the risk of blockage associated with a very small flow-control opening. In the LLFA's experience, restricted discharge rates as low as 1 L/s can be achieved with appropriate maintenance.

The submitted drainage layout and the Causeway Flow model contain a few inconsistencies that require clarification. The layout shows a headwall (HW.03) with a depth of 0.5m, whereas the Causeway Flow model includes headwall HW.01 with a depth of 0.6m. The layout also identifies two permeable paving features, PP-01 (345m², IL 84.95m) and PP-02 (50m², IL 84.95m), while the Causeway Flow model represents four car park storage structures with areas of 51m², 66m², 100m² and 42m² and invert levels of 84.865m, 84.59m, 84.79m and 84.66m respectively. In addition, the layout includes two detention basins (DB.01 and DB.02), each with a base area of 15m² and depth of 0.65m, whereas the Causeway Flow model contains a single depth-area storage structure with a base area of 30m² and depth of 0.5m. Further discrepancies are noted in the location of the permeable paving features, with the Causeway Flow model indicating permeable paving at SW-18 which is not shown on the drainage layout. The applicant should reconcile these differences and provide a coordinated drainage layout and hydraulic model, clearly identifying the location, dimensions and hydraulic parameters of all SuDS features, together with explicit details of how the permeable paving areas connect to the wider drainage network.

The applicant has considered a freeboard of 150mm for the attenuation basins, which is insufficient as 300mm is the minimum required freeboard above the critical 1 in 100yr + climate change storm event water level.

The Causeway Flow model results indicate that an additional storage of 20 m³/ha is considered. This value should be set to zero, or quantitative evidence should be provided for justifying its selection.

The Causeway Flow model results also indicate that a summer Cv of 0.75 and winter Cv of 0.84 have been considered in the model. Since only impermeable area is considered within the model, a Cv of 1 is to be used.

A climate change allowance of 40% has been considered for the 1 in 100-year event. [Environment Agency guidance](#) indicates an allowance of 45% is to be used for the site.

The submitted details do not demonstrate how surface water runoff will be managed during the construction phase. Further information should be provided on the temporary drainage measures, runoff management, and procedures for preventing sediment-laden water or uncontrolled surface water discharges from leaving the site during construction. The discharge of Condition 5 will also be subject to comments received from other consultees.

RECOMMENDATION

Condition 4 (Surface water Drainage) cannot be discharged until the following information is submitted and accepted by the LLFA:

- Appropriate measures, where necessary, to protect the attenuation and SuDS features from groundwater ingress and interaction.
- Revised drainage calculations and/or drainage layout that demonstrates that the drainage calculations accurately reflect the proposed drainage layout and strategy.
- It is noted that the applicant has proposed to limit discharge rates to 2 L/s. Discharge rates should be limited to existing greenfield rate with a 30% betterment. In the LLFA's experience, restricted discharge rates as low as 1 L/s can be achieved with appropriate maintenance.
- Evidence that there is sufficient freeboard (300mm minimum) above the critical 1 in 100yr + climate change storm event.
- If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.
- The drainage strategy should account for climate change in line with Environment Agency guidance. The Upper End Allowance shall be used for the relevant epoch based on the design lifetime of the proposed development in accordance with Standard 3 of the National Standards for SuDS.
- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753)

Condition 5 (Construction Management Plan) cannot be discharged until the following information is submitted and accepted by the LLFA:

- The CMP should demonstrate that surface water can be managed safely during construction and that appropriate measures have been identified to protect groundwater.

Discharge of this condition will be subject to comments received from other consultees, and the Planning Officer should consider these alongside the LLFA's comments when determining whether the condition can be discharged.

INFORMATIVES

- 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).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- 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.
- 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](#).

- Within the calculations, the MADD factor must be set to zero and the margin for "flood risk" warning in hydraulic models been set to $\geq 300\text{mm}$.

If a value other than $0\text{m}^3/\text{ha}$ is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.

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.