

To:	Samantha Stockley	From:	Drainage team
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Planning App Ref:	PL/2026/04464
Service Ref:	Drainage
Date:	11/09/2026

PROPOSAL

Outline planning permission: Some matters reserved

Outline planning application for the change of use of land for the siting of up to 38 holiday lodges, including creation of new vehicular access off Spine Road West, extension of existing shared footway and cycleway along the B4696 Spine Road East and associated landscape planting and infrastructure with all matters reserved except the means of access to the site

SITE LOCATION

Lake 62, Cotswold Water Park, South Cerney

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	×
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application form
- Design Statement
- Flood Risk Assessment & Drainage Strategy – May 2026
- Flood Evacuation Management plan – April 2026
- Existing site plan
- Site location plan
- Planning Statement
- Proposed site 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 applicant proposes up to 38 holiday lodges, access roads, parking areas and ancillary facilities around Lake 62. Surface water management is proposed through the use of permeable gravel surfacing, filter drains and discharge of runoff to Lake 62, reflecting the existing drainage regime across the site. Roof runoff is proposed to discharge directly to the lake, whilst parking and access areas would drain via permeable surfaces, and filter drains before discharging to Lake 62.

The strategy is considered acceptable in principle; however, insufficient information has been provided to demonstrate that the development can safely manage surface water runoff for the lifetime of the development without increasing flood risk elsewhere

The submitted drainage strategy remains preliminary and does not include:

- Surface water runoff calculations.
- Greenfield runoff rate assessments.
- Attenuation storage calculations.
- Climate change drainage modelling.
- Exceedance flow routing plans.
- Hydraulic design information for the proposed drainage system.
- Evidence demonstrating that Lake 62 can accommodate additional runoff volumes from the proposed development.

The FRA identifies that the site is predominantly located within Flood Zone 3 and that the development is subject to a high degree of fluvial flood risk. The assessment identifies a maximum flood level of 88.34mAOD during the 1% AEP plus 70% climate change event. Whilst elevated finished floor levels and raised structures are proposed, further evidence is required to demonstrate that floodplain storage and flow conveyance will not be adversely affected. It is also noted that the applicant proposes to discharge runoff into Lake 62, which lies within the wider Cotswold Water Park SSSI. Insufficient information has been submitted to demonstrate that these proposals will not adversely impact water quality or the hydrological functioning of the lake.

The LLFA notes that the site is predominantly located within Flood Zone 3 and that the Planning Statement confirms that the Exception Test is required. The Local Planning Authority should satisfy itself that the requirements of the Sequential and Exception Tests have been appropriately addressed in accordance with national planning policy.

RECOMMENDATION

Holding Objection: Further information required

The current submission does not provide adequate evidence to demonstrate that surface water runoff can be managed for the lifetime of the development without increasing flood risk on-site or elsewhere, that floodplain storage and flow conveyance will be preserved, or that discharge to Lake 62 is acceptable from both a flood risk and water quality perspective.

Accordingly, the LLFA maintains a holding objection and recommends that planning permission is not granted until the matters outlined below have been satisfactorily addressed. The requested information is considered fundamental to establishing the acceptability of the development in flood risk and drainage terms and is therefore required prior to determination of the application.

- A detailed drainage layout plan showing all proposed drainage infrastructure, including permeable surfacing, filter drains, pipework, chambers, flow control devices, outfalls and maintenance access arrangements.
- A floodplain storage and flood flow conveyance assessment demonstrating that the proposed raised lodges, access roads, parking areas and associated infrastructure will not result in a loss of floodplain storage or adversely impact flood flow routes. Whilst the FRA states that lodges will be elevated with a void beneath (FRA Section 5.3), no quantitative assessment or supporting evidence has been provided to substantiate this claim
- A runoff assessment and hydraulic calculations demonstrating the existing site runoff characteristics (greenfield, brownfield or other appropriate baseline) and proposed post-development runoff rates and volumes. The assessment should demonstrate compliance with Wiltshire Council's requirement for a minimum 30% betterment in runoff rates compared to the existing drainage regime and include existing and proposed discharge rates, runoff volumes, attenuation requirements, and hydraulic modelling for all storm events up to and including the 1 in 100-year return period, including the appropriate climate change allowance. (Wiltshire Council's betterment policy update, which can be found [here](#)).
- Surface water hydraulic and attenuation storage calculations demonstrating the performance of the proposed drainage system for all storm events between the 1 in 1 year and 1 in 100-year return periods, including the appropriate climate change allowance.
- An exceedance flow assessment and exceedance routing plan demonstrating how runoff generated by storm events exceeding the design capacity of the drainage system, blockage scenarios or system failure will be safely managed. The assessment should identify exceedance pathways, ponding areas, flow routes and flood depths, and demonstrate that flooding of buildings, parking areas, access roads and evacuation routes will not occur.
- Evidence demonstrating that discharge of surface water runoff to Lake 62 is acceptable, including confirmation that sufficient hydraulic capacity exists within the receiving waterbody and that flood risk elsewhere will not be increased
- Whilst the submitted FRA includes simple index method water quality calculations which indicate compliance with the SuDS Manual, further information is required demonstrating that both surface water runoff and any proposed treated foul water discharge will not adversely affect water quality, ecological receptors or the hydrological functioning of Lake 62 and the wider Cotswold Water Park SSSI, in compliance with [National Standards for SuDS – Standard 4](#).
- Finished floor level details confirming proposed finished floor levels, freeboard allowances and flood resilience measures for all built development.

- A drainage management and maintenance plan identifying ownership, maintenance responsibilities, inspection frequencies and long-term management arrangements for the lifetime of the development, in compliance with [National standards for SuDS: Standard 7](#).

INFORMATIVES

- The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

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](#).

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.