

To:	Julie Mitchell	From:	Drainage (Cecily Austin)
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Planning App Ref:	PL/2026/04685
Service Ref:	Drainage
Date:	11/09/2026

PROPOSAL

Full planning permission. Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.

SITE LOCATION

Hawke Ridge Business Park, Westbury, BS13 4LD

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- Drainage & Engineering Layout - Sheet 2
- Drainage & Engineering Layout - Sheet 10
- Drainage & Engineering Layout - Sheet 11
- Drainage & Engineering Layout - Sheet 12
- Drainage & Engineering Layout - Sheet 13
- Drainage & Engineering Layout - Sheet 14
- Drainage & Engineering Layout - Sheet 15
- Environment Agency comment
- ES Vol 2 Appendix 12.1 - Flood Risk Assessment Parts 1-5
- ES Vol 2 Appendix 13.1 - Phase 1 Geo-Environmental Assessment Parts 1 and 2
- ES Vol 2 Appendix 13.2 - Phase 2 Ground Investigation
- Flood Risk Assessment and Drainage Strategy Parts 1-5
- Manhole Schedules - Sheet 1, 2,3 and 5
- Schedule of Accommodation – 1 and 2
- Site & Roof Plan
- Site Elevations
- Site Layout
- Site Location Plan
- Site Plan
- SUDS Details - Sheet 1 and Sheet 2

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's flood risk assessment and proposed drainage strategy does not comply with the Non-Statutory Technical Standards for SuDS or Wiltshire Council's local standards. Reasons for objection has been identified, with these key issues outlined below. Recommendations outlining the additional information required to address each objection are provided in the recommendations section following this assessment.

Hydraulic Modelling

The hydraulic modelling outputs require clarification, as they appear to be inconsistent with the proposed discharge strategy. Appendix H in the FRA and SuDS report includes the hydraulic calculations for the site, which has been divided into two separate drainage networks. It is understood that Network 1 is proposed to discharge at a maximum rate of 17.5l/s and Network 2 at a maximum rate of 17.2l/s. Combined, this would result in a total discharge rate of 34.7l/s, which is considered acceptable as this offers a 30% betterment to greenfield rates, and therefore adheres with Wiltshire councils' standards. However, Network 1 appears to contain two separate discharge volumes within the hydraulic modelling outputs, which may indicate the presence of more than one discharge point within the network. It is noted that one of these reported discharge volumes likely represents the link between pond 1 and pond 2. However, it is unclear how this connection is intended to operate hydraulically, and whether the two ponds are designed to function as hydraulically separate attenuation features or as a single system. Further clarification of the modelling approach is therefore required.

It is also noted that the hydraulic model has been undertaken using CV values of 0.75 for summer and 0.84 for winter. These values should be set at 1.0. Whilst the correct CV value is referenced within Table 5-3 of the FRA and SuDS Report, this has not been reflected within the hydraulic modelling, and the submitted calculations should be updated accordingly.

Furthermore, the drainage strategy does not appear to include interception storage calculations or demonstrate how interception requirements have been incorporated into the design. Standard 2 states that the first 5mm of rainfall from the majority of rainfall events will

be managed by interception features and will not result in runoff from the site to surface water or piped systems.

It should also be noted that areas drained by attenuation ponds (with a permanent water pool, which is effectively maintained by the outlet structure) are assumed not to deliver interception in accordance with Standard 2 of the National Standards for SuDS. The drainage strategy shall demonstrate that interception storage is provided for the first 5mm of rainfall from each positively drained surface using alternative interception SuDS features.

Existing Ditches and Watercourse Changes

It is also noted that the proposals include the diversion and infilling of existing ditches and watercourses within the site. However, only limited information has been provided regarding these works, with the submitted details largely confined to a brief description in Section 4.3 of the FRA and SuDS Report. Furthermore, it is unclear on the provided drainage drawings where the proposed diversions and infills are intended to occur.

Whilst indicative cross-sections for minor watercourse diversions have been included within the standard detail drawings, these are not considered sufficient to fully describe the proposed works. In addition, no detailed hydraulic assessment has been provided to demonstrate the effect of the proposed diversions and infilling flood risk both within and beyond the site boundary.

Alterations to existing ditches and watercourses have the potential to modify established flow routes and flood mechanisms within the site and the wider catchment. Further information is therefore required to clearly define the proposed works, assess their hydraulic and flood risk impacts, and demonstrate that they will not increase flood risk on-site or elsewhere, to allow compliance with the NPPF and Wiltshire Council SuDS Guidance.

SuDS Strategy and Source Control

There are also several aspects of the proposed SuDS strategy that require further consideration. Whilst the use of attenuation basins as the primary storage feature is noted and accepted in principle, the drainage strategy does not appear to incorporate any source control SuDS measures. It has been noted that green roofs have been discounted on the basis of the proposed PV panels. However, there is evidence to suggest that green roofs can enhance the performance and efficiency of PV panels. As such, the applicant should further consider the use of green roof systems on the proposed care home and commercial buildings and provide justification where these measures are not considered feasible.

In accordance with National SuDS Standard 2, source control measures to manage water quantity and maintain water quality should be implemented wherever possible, and throughout the management train, so the development is not reliant upon large attenuation features close to the points of discharge.

The LLFA also considers that further consideration should be given to rainwater harvesting within the proposed care home. This measure appears to have been discounted with minor justification, despite there likely being a demand for non-potable water uses. The feasibility of rainwater harvesting should be assessed and, where it is not proposed, justification should be provided.

It is also noted that the FRA and SuDS Report references the use of permeable paving, however, this is not reflected within the submitted drainage layout drawings or hydraulic calculations.

Proposed Outfalls

A final point relates to the proposed outfall from Pond 3, which is shown to discharge into an existing culvert. However, the topographical survey indicates that this culvert may be partially collapsed (refer to figure 3 below), and this issue has not been addressed within the submitted documentation.

Furthermore, no information has been provided regarding the current condition, hydraulic function and capacity of this feature. In the absence of this information, it is not possible to determine whether this is an appropriate discharge location.

Consequently, the LLFA cannot support the proposed outfall location at this stage. Further investigation and supporting information are required to demonstrate that the culvert is in suitable condition, functions as intended and can safely receive flows from the proposed development without increasing flood risk.

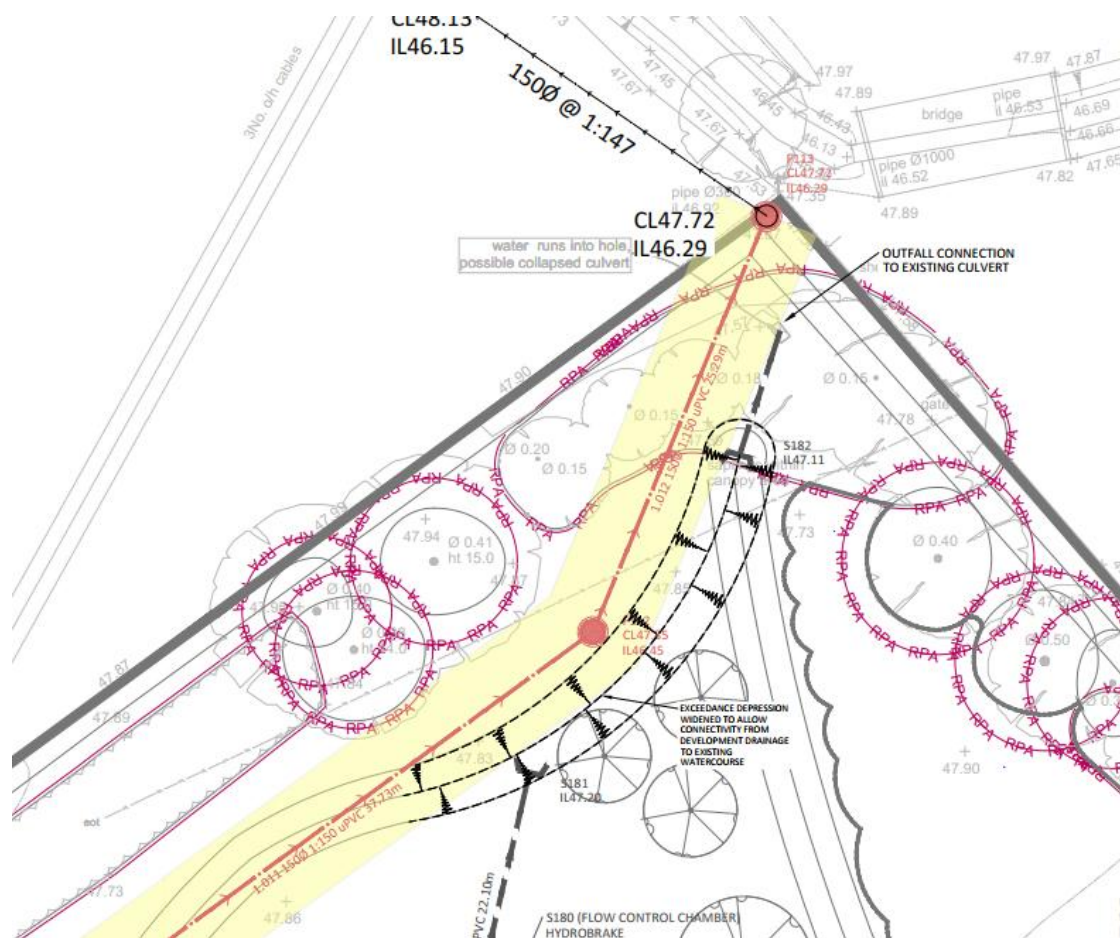


Figure 1: Snip from Drainage and Engineering Layout Sheet 11 showing location of potential collapsed culvert

RECOMMENDATION:

Objection:

1. Inadequate Hydraulic Modelling and Drainage Calculations

In order to overcome this objection, the following should be provided:

- Evidence shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS. Calculations that demonstrate compliance with these interception requirements should be provided.
- Updated hydraulic modelling shall be provided with Cv values set to 1.0
- Clarification shall be provided regarding the two discharge volumes shown within Network 1, and further information provided as to how the link between Pond 1 and Pond 2 is proposed to function hydraulically.

2. Existing Ditches, Land Drains and Watercourses

In order to overcome this objection, the following should be provided:

- Detailed plans shall be provided for all proposed watercourse and ditch diversions or infilling works.
- Existing and proposed cross-sections, together with hydraulic modelling, shall demonstrate no increase in flood risk on-site or off-site for all proposed ditch and watercourse alterations
- The assessment should consider the wider ditch network and connectivity of all affected watercourses, ditches, land drains and culverts.

3. SuDS Strategy and Source Control

In order to overcome this objection, the following should be provided:

- A revised drainage strategy shall be provided demonstrating the use of source control SuDS measures throughout the site where practicable.
- Where source control measures cannot be incorporated, these areas shall be identified and justification provided to explain why implementation is not feasible.
- Rainwater harvesting should be investigated and implemented where feasible in the scheme

4. Proposed Outfalls

In order to overcome this objection, the following should be provided:

- The proposed outfall location of pond 3 is not acceptable at this stage due to uncertainty regarding the condition and capacity of the receiving culvert
- A CCTV survey or other related assessment of the culvert shall be undertaken to confirm its current condition and demonstrate that it remains functional and free from collapse or significant obstruction. A hydraulic assessment shall also be undertaken to demonstrate that the culvert can safely accommodate the proposed discharge without increasing flood risk on-site or elsewhere.

- If the culvert is found to be unsuitable, an alternative outfall or a scheme of improvement works should be provided

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.*

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](#).

- *The applicant should note at a more detailed stage of the application, the drainage team will request further details regarding who is responsible for undertaking maintenance of the drainage network.*
- *If any features of the drainage network (including SuDS), are to be the responsibility of individual plot owners, the applicant must include the drainage strategy (including detailed drawings) & maintenance regime in the title deeds of the property.*
- *It is noted that a detailed construction management plan will be provided at a more detailed stage of the application. The applicant must ensure the CMP demonstrates how surface water will be safely managed, mitigating flood risk to people & property. In addition, the applicant will be required to demonstrate how pollution to groundwater & watercourses will be mitigated throughout construction.*

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.