

FAO: James Mitchell
Wiltshire Council Drainage

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PLANNING CONSULTATION RESPONSE TECHNICAL NOTE

Proposal: *The development of 90 dwellings with new access from Blind Lane, internal roads and footpaths, areas of open space (including play space), drainage, landscaping and associated plant and works.*

Dear James,

This Technical Note has been prepared in response to your consultation notes ref Drainage-PL/2026/01383 (outlined below). We have responded to these comments in [blue](#).

Standard 1: runoff destinations

The applicant must submit evidence demonstrating how runoff from the development will be discharged to the following final destinations, to the maximum extent practicable, in accordance with Standard 1 of National Standards for SuDS. The discharge hierarchy is set out below – currently the highest priority option (collection of water for reuse) has not been fully considered.

- priority 1: collected for non-potable use
- priority 2: infiltrated to ground
- priority 3: discharged to an above ground surface water body
- priority 4: discharged to a surface water sewer, or another piped surface water drainage system
- priority 5: discharged to a combined sewer

The applicant must outline how water collection for re-use has been fully considered as part of their proposals.

REASON: As stated in the National Standards for SuDS, the aim should be to discharge surface water run-off, to the maximum extent practicable, as high up the drainage hierarchy as possible.

Water butts have been proposed in rear gardens for every plot, although the storage they provide has not been taken into account in the drainage modelling.

Whilst measures such as water butts can provide a degree of localised source control and water re-use, their effectiveness is dependent upon ongoing maintenance and appropriate use and management by individual homeowners.

As such, we do not think they can be relied upon as a critical component on the site's surface water strategy.

Standard 2: interception

The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS, relying on a pipe-to-pond system with no source control features.

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.

REASON: To ensure rainfall for the majority of rainfall events does not result in runoff from the site to surface waters or piped drainage systems.

As discussed in our meeting on 18/08/26, rain gardens and swales have been provided where they can feasibly be fitted. These features, together with the permeant pool in the ponds, will assist with the interception of the first flush. The water absorbed by the planting within the SuDS features will also contribute.

Standard 3: management of extreme rainfall and flooding

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. The only exception to this would be if the applicant accurately provided revised estimate of additional storage capacity within the network and used that as the basis for their hydraulic model.

The MADD factor has been set to 0.

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, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

Refer to the Wainhomes Construction Management Plan

Evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.

A sensitivity analysis has been carried out for the 1 in 100cc event and an absolute worst case scenario. We have assumed the time of concentration of the flood event is '0', meaning that flood flows will instantly reach the top of the bank. We have also maintained the level of the submerged outfall at peak for the whole duration of the model run, which we believe it's a very conservative approach. It can be seen from the calculations that water levels within the pond increase slightly, although they are well below the top of the ponds.

Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.

Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event

in respect to a building (including basement) or utility plant susceptible to water within the development.

It should be noted that the sistem has been designed not to flood for return periods up to and including the 1 in 100cc event (cc – climate change 45%). The exceedance plan shows flow paths for events with lower probability of occurrence than the design return period. Additional flow arrows have been included to show main flow paths.

It should also be noted that plot FFLs are always 150mm above external ground level as a minimum.

Standard 4: water quality

The applicant must provide a pollution hazard assessment for all areas draining to SuDS features, and demonstrate that the proposed treatment train achieves the required pollution mitigation indices for suspended solids, metals, and hydrocarbons, using the Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3).

At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs).

From the calculations included in the Drainage Tehcnical Note, it can be seen that the ponds would be sufficient to deal with water treatment, however a system of rain gardens and some 'tanked' permeable paving areas have also been proposed. This will significantly improve the quality of the outfall in the majority of the site.

The applicant must explicitly outline details of how silt will be captured and disposed of such that it does not reduce storage capacity within the attenuation basins.

The Maintenance Schedule in the Drainage Tehcnical Note should be followed, with any removed silt to be taken off site.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

A plan showing the cross sections and design of any attenuation pond and its components.

Cross sections of the proposed ponds can be seen on drawing CLFA137-CLFA-00-XX-DR-C-0567

As the proposed drainage strategy will drain an area greater than 1000m² to attenuation basins, as per the guidance within the SuDS Manual, the applicant must provide an assessment from a suitably qualified ground engineering professional that the basins are appropriately designed and will not pose a geotechnical risk.

Refer to the specialist assessment



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, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

[Refer to the Wainhomes Construction Management Plan](#)

Yours sincerely,

Francisco Alguacil
Director

For and on behalf of CLFA Design Limited