

To:	Development Management	From:	Drainage Team (AtkinsRéalis)
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Planning App Ref:	LP/2025/04260
Service Ref:	Drainage
Date:	03/12/2025

PROPOSAL

Installation of two number temporary modular units to provide four additional classrooms with toilet facilities.

SITE LOCATION

Springfield School, Curzon Street, Calne, SN11 0DS.

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

- Application for Planning Permission (Application Form).
- Existing Site Plan (13-11 ~).
- Existing Topographic Survey (10-11 ~).
- Design & Access Statement (13-11 DAS rev. A).
- Proposed Ground Floor Plan (REVISED ~).
- Drainage Plan (REVISED ~).
- Proposed Site Landscaping Plan (REVISED ~).
- Proposed Elevations A & B (REVISED ~).
- Proposed Elevations C & D (REVISED ~).

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 proposes 2x temporary classroom structures on an area currently considered greenfield (grass area located behind existing timber sheds). Drainage for the temporary classrooms is proposed to connect to the existing combined drain. The applicant has not provided evidence as to the application of the SuDS hierarchy in line with the National SuDS Standards (2025), including the consideration of rainwater harvesting, infiltration (e.g. via soakaway) or connection to an existing watercourse. (The purpose being to control/limit runoff into combined sewers and reduce the likelihood of sewer overflows).

It is also noted that the applicant proposes the removal of 4x trees and the re-surfacing of currently grassed areas with permeable tarmac and artificial grass, reducing evapotranspiration at the site, infiltration and increasing surface water runoff. The applicant has not provided any information regarding the installation/formation of either surface, including respective permeability, anticipated exceedance flow paths and whether either surface is proposed to extend beneath the temporary classrooms.

It is noted that the site for development is particularly small (approximately 0.035ha) and is unlikely to significantly increase flood risk to the surrounding area, however sufficient detail has currently not been provided.

RECOMMENDATION

Holding objection as further information is required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

- The anticipated lifetime of the 2x proposed temporary classroom structures.
- The proposed surface beneath the proposed temporary classroom structures (i.e. are the structures situated on a foundation/base or are they stilted). Is infiltration to ground possible beneath the proposed structures or do the structures extend to ground?
- Evidence of the full consideration of the SuDS hierarchy, in line with the National SuDS Guidance (2025). The applicant should provide evidence that all options at each level have been exhausted before proposing the disposal of surface water to a combined sewer/drain. This is required to control/limit runoff into combined sewers and reduce the likelihood of sewer overflows.
 - 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:
 - 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.
 - In accordance with Standard 1 of National Standards for SuDS, rainwater harvesting shall be considered in all circumstances where any of the following apply:
 - There is a demand for non-potable water and available contributing catchment area that will deliver safe and efficient water savings.
 - There is a need for landscape irrigation.
 - The development is in an area identified as seriously water stressed.
 - In accordance with the Sewerage Sector Guidance (paragraph C.3.12) and Standard 1 of the National Standards for SuDS, the applicant is required to consider how surface water for re-use can be maximised, or provide justification as to why it cannot be achieved on this site.
- Should the applicant continue with the proposal to dispose of surface water via the combined drain/sewer, the local sewerage undertaker should be consulted at an early stage to ensure that sufficient capacity is available in the existing sewer system. In accordance with Standard 1 of the National Standards for SuDS, where a connection is to be made to the surface water or combined sewer, the applicant shall provide confirmation from the sewerage undertaker that the connection will not result in an increase in flood risk, and acceptance of an agreed connection point and discharge rate for surface water disposal.

INFORMATIVES

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 sets out 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.

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Paddy O'Neill (AtkinsRéalis on behalf of Wiltshire Council Drainage)