

To:	Development Management	From:	Drainage Team (AtkinsRéalis)
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Planning App Ref:	PL/2025/08855
Service Ref:	Drainage
Date:	11/12/2025

PROPOSAL

Erection of 1no. dwelling, garaging, provision of church car parking, access, landscaping and associated works.

SITE LOCATION

Land adjacent to Truant House, Church Lane, Malborough, SN8 3JY.

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

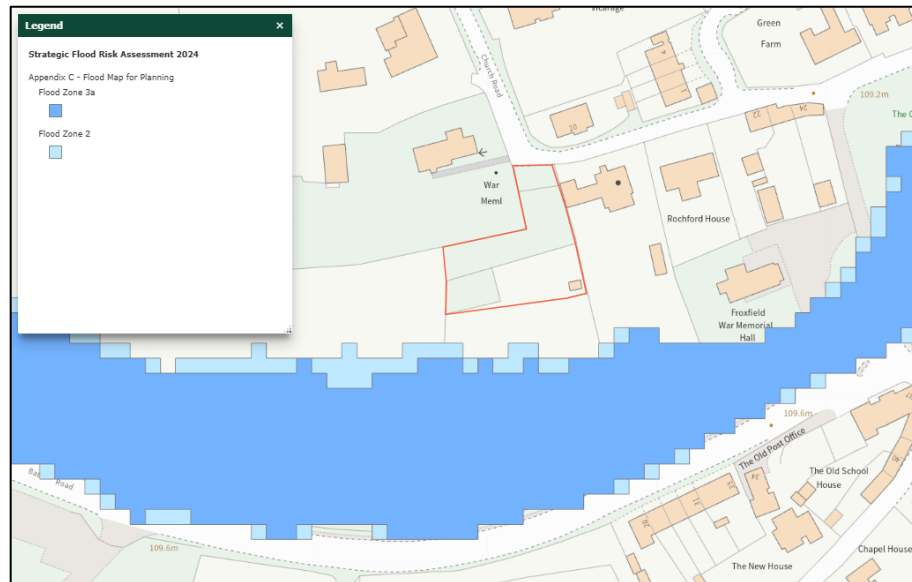
- Application for Planning Permission (Application Form).
- Drainage Technical Note (including attached drainage strategy).
- Existing Site Location Plan.
- Existing Site Plan.
- Groundwater Technical Note.
- Proposed Site Plan.
- Proposed Site Sections.
- Planning, Design and Access Statement (updated).
- Revised Details Covering Email (dated: 19th November 2025).

Based on the information provided, the LLFA has no objections to the proposal on the basis that the proposed drainage strategy adheres to the National Standard for SuDS (2025).

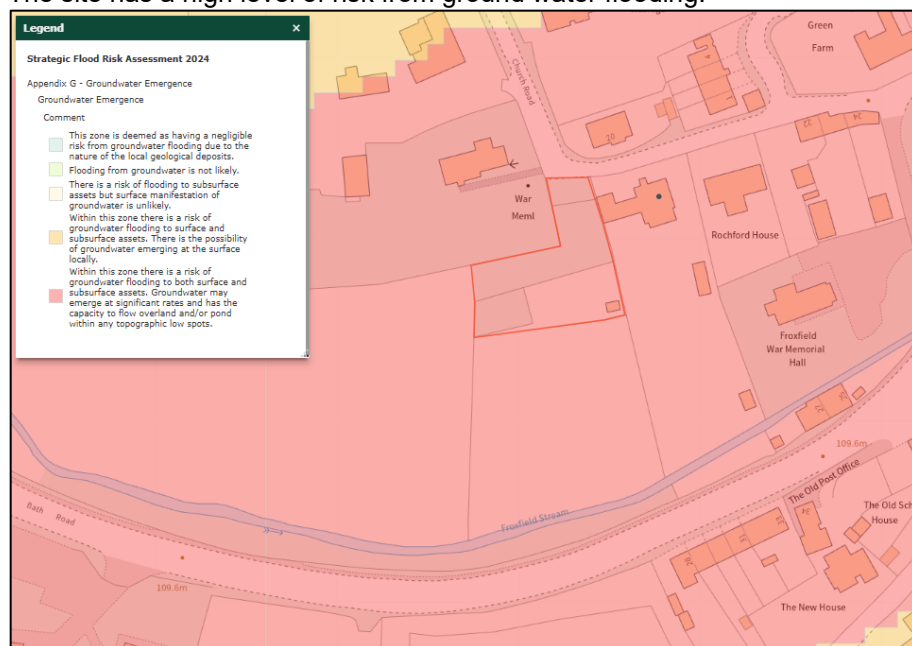
The applicant should validate the proposal to dispose of surface water via infiltration (gravel sumps) through appropriate Ground Investigations and supporting detailed desk studies.

FLOOD RISK

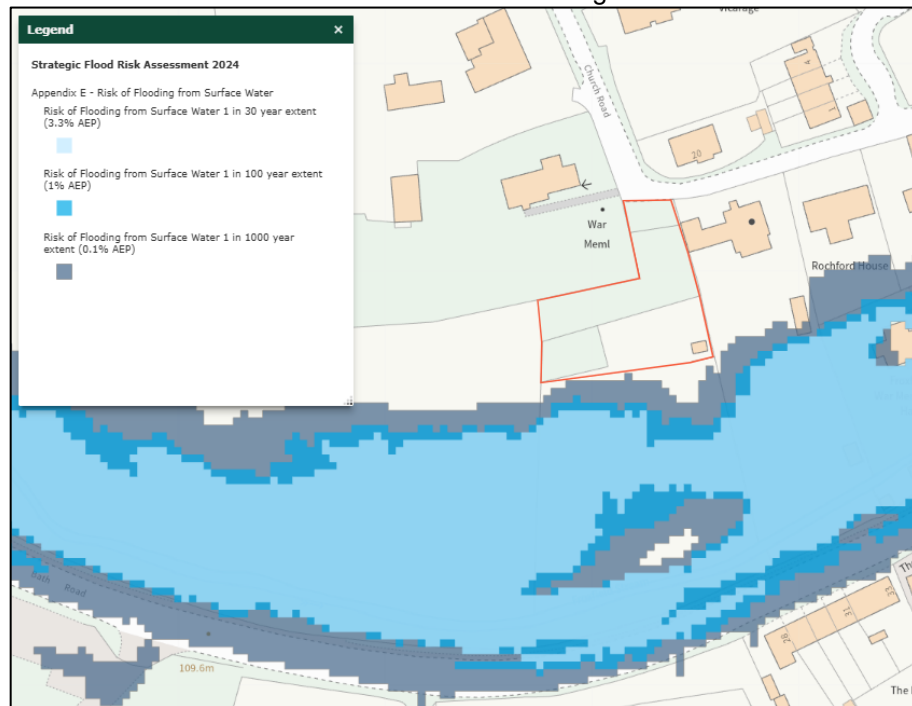
The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and there has a low level of risk from fluvial flooding.



The site has a high level of risk from ground water flooding.



The site has a low risk from surface water flooding.



The SFRA does not indicate that the site is at risk of flooding from sewers or reservoirs. Overall, the site is shown to be at a low cumulative risk of flooding in the future from all sources.

DRAINAGE STRATEGY / DRAINAGE DESIGN

Based on BGS Mapping the site is indicated to be underlain by freely draining... soils (Soilscape 7), suggesting the suitability for infiltration to be utilised to dispose of surface water. The suitability of infiltration to dispose of surface water will need to be assessed by the applicant using appropriate Ground Investigations and supporting detailed desk studies.

Based on DEFRA Magic Maps the site is **not** shown to be within a Source Protection Zone or Drinking Water Protected/Safeguard Area or Zone.

The applicant should note that in all instances the preference should be to utilise blue-green SuDS which provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity). The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features should be provided at an early stage in order to fulfil Wiltshire Council requirements, NPPF, PPG and Non-Statutory Technical Standards for SuDS; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost.

The LLFA would consider this to be a greenfield site for the purposes of planning.

The applicant should note the EA's updated climate change guidance (dated [27 May 2022](#)) when preparing the Flood Risk Assessment / Drainage Strategy.

The applicant should provide the following information as part of the planning application in accordance with Wiltshire Council requirements, NPPF, PPG and National Standard for SuDS (2025):

- Evidence that the [surface water disposal hierarchy](#) has been applied.
- Soakaway testing in accordance with BRE365, and groundwater level monitoring (taking into account seasonal variations).
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- If access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

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 \(www.gov.uk\)](#)"

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.

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