

To:	Verity Giles-Franklin	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2025/09349
Service Ref:	Drainage
Date:	05/01/2026

PROPOSAL

Reconfiguration and resurfacing of the designated car parking area for the main entrance at Melksham Community Hospital, and the replacement and installation of associated external lighting.

SITE LOCATION

Melksham Community Hospital, Spa Road, Melksham, SN12 7NZ.

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Combined Geo-Environmental & Geotechnical Ground Investigation Report (GIR)*
- *Drainage Layout*
- *Existing Site Plan*
- *Planning Statement*
- *Proposed Drainage Details – Sheet 1 & 2*
- *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.

RECOMMENDATION:

No objection subject to the following conditions:

It is noted the applicant has provided a Drainage Layout drawing, however the applicant must provide further details related to the drainage strategy:

- Existing brownfield runoff rates for the site (National Standards for SuDS: [Standard 1: runoff destinations](#)).
- Post development runoff rates. These must also be in accordance with Wiltshire Council's betterment policy update, which can be found [here](#). (National Standards for SuDS: [Standard 1: runoff destinations](#)).
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features (National Standards for SuDS: [Standard 1: runoff destinations](#)).
- SuDS source control measures to manage water quantity and maintain water quality will 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 (National Standards for SuDS: [Standard 2: interception](#)).
- Exceedance routes that minimise the risks to people and property (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#)).
- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753 & [Standard 3: management of extreme rainfall and flooding](#)).
- Calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment (National Standards for SuDS: [Standard 4: water quality](#)).
- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).
- The applicant must provide the hydraulic model which relates to the Drainage Layout drawing.
- The applicant must submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).
- The applicant must submit a construction management plan to demonstrate how flood risk to people & property, and pollution to groundwater, will be mitigated throughout construction (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

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 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.