

To:	Jane Sanger	From:	Drainage Team
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Planning App Ref:	PL/2025/09902
Service Ref:	Drainage
Date:	29/01/2026

PROPOSAL

Discharge of Condition 4 (surface water drainage strategy) & 5 (locations of bat roosts and nesting opportunities for birds (e.g. bat and bird boxes) of PL/2025/06520

SITE LOCATION

Woodborough House, Church Farm Lane, Woodborough, Pewsey, SN9 5PL

APPLICATION DOCUMENTS REVIEWED

- Application Form - NO WEB
- Location and Site Plan
- PL-2025-06520 Decision Notice
- Soakaway Calculations
- Soakaway Plan

ASSESSMENT OF THE PROPOSAL

Context

In 2025 The LLFA had the following conditions (condition 4) for which information was required before these could be discharged.

4. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for Sustainable Drainage Systems (SuDS) has been submitted to and approved in writing by the Local Planning Authority. In order to discharge the above drainage condition, the following additional information shall be provided:
 - The design shall be confirmed by infiltration tests undertaken in accordance with BRE 365
 - A soakaway design calculation shall be submitted in accordance with Soakaway Guidance. The details must demonstrate that the soakaways have sufficient capacity for the proposed surface water drainage and are sited a minimum of 5m from the building foundation.
 - Exceedance routes that minimise the risks to people and property.
 - A maintenance and management plan for all SuDS features proposed on the site.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of minimising drainage issues and ground water flooding at the site.

Assessment

The applicant has submitted information in support of the discharge of Condition 4, including:

- A Soakaway Plan, identifying the proposed locations and capacities of two crate soakaways and associated surface water drainage features.
- Soakaway calculations, including infiltration testing undertaken in accordance with BRE Digest 365, demonstrating that the proposed soakaways are appropriately sized and located a minimum of 5 metres from the proposed building.
- Details of a maintenance and management regime for the proposed SuDS features.

The submitted information demonstrates that infiltration testing has been undertaken using an appropriate methodology and that the proposed soakaway design is based on sitespecific test results; the calculations provided indicate that the proposed soakaway capacity should be sufficient to manage the anticipated surface water runoff from the development, however the calculations do not state the factor of safety applied to the design infiltration rate and do not report the halfdrain time as required by BRE Digest 365.

Furthermore, the submission does not include details of exceedance flow routes, as required by Condition 4. Although a brief written statement suggests that exceedance flows would follow the site's natural topography, no plan or drawing has been provided to clearly show how these flows would be directed in a controlled way to minimise risks to people and property.

Accordingly, clarification of the factor of safety and half-drain time and the submission of an exceedance route plan are required to confirm the robustness and compliance of the drainage design

RECOMMENDATION

Condition 4 cannot be discharged until the following information is submitted and accepted by the LLFA:

- Evidence or calculations to demonstrate that the soakaway has been designed for:
 - 1 in 100yr + cc flows
 - Half drain time <24hrs
 - Highest groundwater level at least 1m from base of the soakaway
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.

TABLE 25.2 Suggested factors of safety, F, for use in hydraulic design of infiltration systems (designed using Bettess (1996). Note: not relevant for BRE method)			
Size of area to be drained	Consequences of failure		
	No damage or inconvenience	Minor damage to external areas or inconvenience (eg surface water on car parking)	Damage to buildings or structures, or major inconvenience (eg flooding of roads)
< 100 m ²	1.5	2	10
100–1000 m ²	1.5	3	10
> 1000 m ²	1.5	5	10

- The applicant should submit an exceedance route plan clearly showing how surface water flows in excess of the system capacity will be directed away from buildings and neighbouring land to minimise risks to people and property.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- Applicants should verify any requirements set by the Environmental Agency and local water authorities regarding the installation and discharge of package treatment plant systems, as a permit may be necessary
- All new drainage will need to comply fully with Building Regulations Part H

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.