

To:	Lucie Turner	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2025/09917
Service Ref:	Drainage
Date:	09/02/2026

PROPOSAL

Outline Planning Permission with some matters reserved

The construction of up to 2 self-build dwellings and associated infrastructure.

SITE LOCATION

Land to the east of New Road, Melksham, SN12 7QZ

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 Form
- Design & Access Statement
- Illustrative Site Layout Plan
- Planning Statement
- Site Location Plan
- Surface Water Drainage Strategy

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 proposal comprises of 2 no. of self-build dwellings and associated infrastructure and requires outline planning permission.

The site is in Flood Zone 1 and there is a medium risk of surface water flooding in some areas and a low risk of groundwater flooding. The site layout has been developed sequentially with respect to surface water flood risk, and no development is proposed within areas identified as being susceptible to surface water flooding.

The proposal employs rainwater butts to collect run-off from the proposed development roof via rainwater downpipes and guttering, and unlined permeable paving for roads and driveways, allowing water to infiltrate and stored within a tanked sub-base, providing approximately 63.60 m³ of attenuation across two zones. Overflows from the rainwater butts are proposed to be discharged into the storage system provided by the permeable paving. The captured water is proposed to be reused to water vegetation, with the remainder infiltrating to ground. However, at this stage the infiltration rate utilised in the design has been assumed. Soakage tests must be undertaken in accordance with BRE 365 and included along with the drainage strategy to ensure the assumptions are valid. The surface water drainage strategy also shows the site to have low to moderate infiltration potential. This poses a risk if the applicant is entirely reliant on infiltration.

The applicant notes the presence of a surface water feature (a pond) located approximately 80 m north of the site, but that discharging runoff to this feature would necessitate installing drainage pipework across third-party rural land, and as such, has not been deemed feasible. There are also no public surface water or combined sewers in the vicinity of the site that could be reasonably utilised for discharge. These constraints highlight that the site has no viable alternative discharge route if infiltration is found to be unsuitable. This underscores the importance of establishing infiltration feasibility at an early stage.

RECOMMENDATION

Holding objection as further information 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:

1. Evidence that soakage tests have been undertaken in accordance with BRE 365 to demonstrate that infiltration is feasible by the provision of calculations that demonstrate that the soakaway has been designed for:
 - 1 in 100yr + cc flows (for multiple properties)
 - 1 in 10yr + cc flows (for individual properties)
 - Half drain time <24hrs
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.
2. Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway/permeable paving.

This information is necessary given that the applicant intends to discharge all surface water via infiltration, with no feasible alternative discharge routes identified.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

1. **No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for 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 must be provided:

- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- Detailed pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.

INFORMATIVES

- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- 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 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.