

To:	Joe Leesam	From:	Drainage Team
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Planning App Ref:	PL/2026/00194
Service Ref:	Drainage
Date:	23/02/2026

PROPOSAL

Demolition of existing dwelling and associated outbuildings and erection of a replacement dwelling; with associated parking, landscaping, private amenity space and access arrangements

SITE LOCATION

Astra Cottage, Oare, Marlborough, SN8 4JA

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
- Existing Ground Floor Plan
- Existing Site Plan
- Heritage, Design and Access Statement
- Location Plan
- Proposed First Floor and Roof Plan
- Proposed Ground Floor Plan
- 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 not 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 all documents submitted and we do not take any responsibility for incorrect data or interpretation made by the authors.

The applicant notes within the Design & Access Statement that the site lies in Flood Zone 1 and is at low risk from all sources, but they have not submitted any drainage strategy or Flood Risk Assessment.

The proposal is for a replacement dwelling; the application does not provide a complete surface water drainage strategy. The soakaway referenced in the Design & Access Statement and shown on the ground floor plan has no supporting infiltration tests, sizing calculations, or design details, so its feasibility cannot be confirmed. The applicant also mentions a connection to the mains sewer, but it is unclear whether this relates to surface water, and the submission does not demonstrate compliance with the SuDS hierarchy. Although permeable surfaces, a green roof, and water butts are included on the site plan and noted in the Design & Access Statement, the strategy lacks sufficient technical information to show that surface water can be safely managed without increasing flood risk. On this basis, we are recommending a holding objection, as there is currently no feasible drainage strategy in place.

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:

- The applicant should also provide an existing drainage strategy to show how surface water is currently managed on the site. In addition, they should submit a detailed proposed drainage strategy drawing, including pipe routes, levels, and the proposed soakaway location.
- The Design & Access Statement states in section Drainage & Flood risk (page 18) that there is a sewer connection; however, does not provide details regarding the type of sewer. To demonstrate compliance with NSS, [Standard 1: runoff destinations](#), the applicant must outline how all surface water flows will be managed onsite. The LLFA will not accept surface water flows discharging to a foul or combined sewer.
- The applicant must provide additional details on the green roof, including how this feature integrates with the overall surface water system, as the plans show them but provide no information on their drainage function or connection within the SuDS approach
- Evidence that Soil percolation tests/soakage tests have been undertaken in accordance with Building Regulations / BRE 365, and confirmation of infiltration rates. (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14-3.15)
- 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

(National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14-3.17)

- The applicant must provide cross section drawings for all proposed surface water features, showing levels, freeboard allowances, and depths, to demonstrate that the drainage system can function hydraulically and that adequate clearances are maintained.
- The applicant must supply an exceedance flow routing plan illustrating how surface water will safely flow across the site during storms that exceed system capacity (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))

- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

INFORMATIVES

- All new drainage will need to comply fully with Building Regulations Part H. (they should engage with the building control department in order to ensure this).
- The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption of infiltration drainage features.
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- 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.