

To:	Development Management	From:	AtkinsRéalis (Drainage Team)
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Planning App Ref:	PL/2025/04260
Service Ref:	Drainage
Date:	25/02/2026

PROPOSAL

Installation of two number temporary modular units to provide four additional classrooms with toilet facilities. Part Retrospective.

SITE LOCATION

Springfield School, Curzon Street, Calne, SN11 0DS.

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

- Revised Drainage Strategy, prepared by SDS Consulting (Report Ref. 7061-RP01 Issue 01 (9th February 2026)).

Other documents also considered:

- Previous drainage responses to PL/2025/04260:
 - 03/12/2025 – *Summary of consultee position: Holding objection: Further information required.*
 - 06/01/2026 – *Summary of consultee position: Holding objection: Further information required.*

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 initial proposal from the applicant was to erect 2x temporary classroom structures within a grass area located behind existing timber sheds.

As set-out in a previous drainage response on 03/12/2025, the site is considered greenfield. The provided Drainage Strategy defines the site as brownfield.

Drainage for the temporary classrooms is proposed to outfall to a proposed cellular soakaway (3.0L x 9.0W x 0.8D m) to the south of the proposed classrooms.

Surface water is proposed to be collected via Aco drains and 1x gully:

- Aco drains to the south of the site are proposed to outfall to the cellular soakaway.
- Aco drains to the north of the site and the 1x gully are proposed to discharge to the existing surface water drain.

An agreement with the local sewerage undertaker (Wessex Water) has been provided for a foul water connection only. This does not permit the applicant to outfall a surface water system to the combined sewer.

As set-out in a previous drainage response on 06/01/2026, it is noted that the applicant proposes the removal of 4x trees and the re-surfacing of currently grassed areas with permeable tarmac and artificial grass, reducing evapotranspiration at the site, infiltration and increasing surface water runoff. The applicant has not provided any information regarding the installation/formation of either surface, including respective permeability, and whether either surface is proposed to extend beneath the temporary classrooms. The applicant has provided high-level details regarding anticipated exceedance flow paths within paragraph 3.51 on the 'Revised Drainage Strategy'.

It is noted that the site for development is particularly small (approximately 0.035ha) and is unlikely to significantly increase flood risk to the surrounding area, however sufficient detail has currently not been provided.

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:

- Should the applicant propose to dispose of **surface water** via the combined drain/sewer, written agreement from the local sewerage undertaker must be provided. This agreement should include acceptance of flow rates and the location of connection.

In accordance with Standard 1 of the National Standards for SuDS, where a connection is to be made to the surface water or combined sewer, the applicant shall provide confirmation from the sewerage undertaker that the connection will not result in an increase in flood risk, and acceptance of an agreed connection point and discharge rate for surface water disposal. The provided agreement with Wessex Water is for **foul water discharge only**.

We would question the need for the connection at the north of the site (which will ultimately end up in the WW sewer), where a connection to the sites positive drainage system (ultimately served by soakaway) appears to be a feasible possibility.

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INFORMATIVES

As-built AutoCAD (DWG) Drawings

The drainage team requests that the applicant provides AutoCAD (DWG) plans and drawings of all as-built drainage assets, SuDS systems, flow controls pipe networks and associated exceedance routing.

No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer is requested submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:

1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
2. As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
4. AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
5. PDF format for record purposes.
6. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.
7. An updated SuDS Maintenance Plan reflecting the final as-built arrangement.

The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system.

Outfall structures and flow controls

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 swales, soakaways and drainage field) 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 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.

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