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| <b>To:</b> | Victoria Blackmore | <b>From:</b> | Drainage Team (Arun Govind T) |
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| <b>Planning App Ref:</b> | PL/2026/00654 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 18/02/2026    |

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## PROPOSAL

Discharge of condition 3 (Surface Water) and 4 (Materials) of PL/2024/05413

## SITE LOCATION

237 London Road, Chippenham, SN15 3AP

## APPLICATION DOCUMENTS REVIEWED

- Application Form
- PL-2024-05413 - Decision Notice
- PL-2024-05413 - Site Location Plan
- Surface Water Disposal Plan

## ASSESSMENT OF THE PROPOSAL

### *Context*

In 2025 The LLFA had the following conditions (Condition 3: Surface Water) for which information was required before these could be discharged

- 3. No development shall commence on site until a scheme for the discharge of surface water from the site (including surface water from the access/driveway), incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first brought into use until surface water drainage has been constructed in accordance with the approved scheme.**

**REASON: To ensure that the development can be adequately drained without leading to increased flood risks elsewhere.**

### *Assessment*

The applicant has submitted a rough site plan which indicates applicant proposes to manage surface water entirely through infiltration-based measures, including a permeable paving, laid over permeable substrate, and a system of rainwater downpipes that collect roof runoff and convey it to two proposed soakaways located on northern and southern sides of the site.

Although this is a reasonable SuDS style approach to controlling runoff onsite, the submission is incomplete because the applicant has not provided any BRE 365 infiltration test results or soakaway sizing calculations to demonstrate that the soil can infiltrate effectively and that the proposed storage is adequate, nor have they confirmed that the soakaway is positioned away from the building foundations, which is required to avoid structural risk. They have also not supplied a maintenance and management plan for the proposed drainage features, and there is no exceedance route plan showing how water will safely flow during storm events if the system becomes overwhelmed.

## RECOMMENDATION

Condition 3 cannot be discharged until the following information is submitted and accepted by the LLFA:

- In accordance with the Sewerage Sector Guidance (paragraph C.3.12) and Standard 1 of the National Standards for SuDS, the applicant is required to consider how surface water for re-use can be maximised, or provide justification as to why it cannot be achieved on this site.
- The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with Standard 4 of the National Standards for SuDS.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- The applicant shall submit a manhole / inspection chamber schedule to include cover and invert levels.
- The two proposed soakaways shall be located a minimum of 5 m from the building, in accordance with Soakaway Guidance.
- In accordance with Standard 3 of the National Standards for SuDS, overland exceedance routes are to be identified and shown on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate no adverse flood risk to the development of elsewhere.
- 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.
- 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.
- 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.

## INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the Wiltshire Soakaway Guidance.

## 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.