

To:	Development Management	From:	AtkinsRéalis (Drainage Team)
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Planning App Ref:	PL/2026/01111
Service Ref:	Drainage
Date:	16/03/2026

PROPOSAL

Demolition of existing triple garage and construction of self build dwelling within curtilage of existing house.

SITE LOCATION

2 Church Lane, Limpley Stoke, Bath, BA2 7GH.

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application for Planning Permission (dated 17/02/2026).
- RIBA Work Stage 3 - Design and Access Statement, prepared by Enspace Architects (Ref. 2502, issued: February 2026).
- Location Plan (Dwg. No. 2507-001 Rev. P1, dated 02/02/2026).
- Proposed Site Plan (Dwg. No. 2507-3 001 Rev. P1, dated 02/02/2026).
- Site Drainage Plan (Dwg. No. 2507-3 701 Rev. P1, dated 02/02/2026).
- Site Drainage Details (Dwg. No. 2307-3 702 Rev. P1, dated 02/02/2026).

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 proposed development is minor in nature and does not propose substantial changes to the existing scenario regarding flood risk. As shown on the [Wiltshire Council Strategic Flood Risk Assessment Data Explorer](#), the site is not shown to be located within a Flood Zone, or an area at considerable risk of surface- or groundwater flooding. A site-specific Flood Risk Assessment (FRA) is not required for this application.

As set out in the Design & Access Statement, the applicant has proposed surface water collection via rainwater harvesting systems (unspecified), and discharging surface water from the development via a cellular soakaway - thus complying with Standard 1 on the National Standards for SuDS (2025). It is noted that the submitted Drainage Plan acknowledges that the site-specific infiltration rate is yet to be confirmed.

It is acknowledged that the increased area of hardstanding is especially minimal, and that the resurfacing of the front driveway is to utilise a freely drainage gravel surface.

RECOMMENDATION

No objection subject to the following conditions:

1. The applicant provides a site-specific infiltration rate to support the proposed use of a cellular soakaway to manage surface water. No development shall take place until ground investigations, including soakaway testing in accordance with BRE 365, have been carried out on site, and evidence has been provided to demonstrate that the results of these investigations have been considered in the drainage design which has been submitted to and approved by the local planning authority.

In order to discharge the above drainage condition the following additional information must be provided:

- Soakaway testing in accordance with BRE365 completed at the proposed location of the cellular soakaway.
- Appropriate design and calculations that demonstrate the proposed cellular soakaway has been sized accordingly with regards to the infiltration rate of the site in order to: manage the 1 in 10-year storm event, and shall half drain-down within 24hours.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- 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).
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker (in this instance Wessex Water).
- 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.

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