

To:	Joe Leesam	From:	Drainage Team
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Planning App Ref:	PL/2026/00194
Service Ref:	Drainage
Date:	21/04/2026

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	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form (*Feb 2026*)
- Existing Ground Floor Plan (*Feb 2026*)
- Existing Site Plan (*Feb 2026*)
- Heritage, Design and Access Statement (*Feb 2026*)
- Location Plan (*Feb 2026*)
- Proposed First Floor and Roof Plan (*Feb 2026*)
- Proposed Ground Floor Plan (*Feb 2026*)
- Proposed Site Plan (*Feb 2026*)
- Drainage Statement (*Apr 2026*)
- Proposed Site Plan (*Apr 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 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.

We acknowledge that the applicant has reconsulted with additional information and the issues previously raised regarding the lack of a detailed and evidenced surface water drainage strategy have now been addressed through the submission of a full Drainage Statement. Surface water from the roof and courtyard is managed entirely on site using a SuDS-led infiltration approach, with rainwater first captured at source via water butts and a green roof, then conveyed through filter drains that provide attenuation and water quality treatment before discharging to a geocellular soakaway in the rear garden. We also note that, as shown on the Milton Architects Proposed Ground Floor Plan, the soakaway will be located a minimum of 5 m from all buildings and structures, in accordance with the National Standards for SuDS.

The soakaway has been designed using BRE365 infiltration testing and conservatively sized with MicroDrainage calculations to accommodate the 1 in 100 year storm plus 45% climate change allowance, with no discharge to the public sewer, exceedance flows directed away from the dwelling, and no increased flood risk.

On this basis, no objection is raised, subject to conditions, requiring the submission and approval of final detailed drainage design information to confirm levels and exceedance flow routing in accordance with National SuDS Standards.

RECOMMENDATION

No objection subject to conditions

- 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:

- The exceedance flow routing is currently presented only at an indicative level. The applicant should submit pre and post-development exceedance flow route plans and associated site levels to demonstrate that flows from the 1 in 100 year plus climate change event are directed away from the proposed dwelling and safely managed within the site, without increasing flood risk to neighbouring land or the adjacent highway, in accordance with National SuDS Standards ([Standard 3: management of extreme rainfall and flooding](#)).
- The applicant should submit a revised Drainage Strategy (DS) drawing that reflects the proposed precise soakaway location.
- The applicant must provide cross section drawings for all proposed surface water features, including the geocellular soakaway, green roof, filter drains etc showing levels, freeboard allowances, and depths, to demonstrate that the drainage system can function hydraulically and that adequate clearances are maintained.

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.
- The applicant confirms that responsibility for the maintenance of the surface water drainage system will rest with the plot owner from first occupation of the dwelling and for the lifetime of the development. A copy of the approved drainage strategy and the associated maintenance and management regime will be included within the title deeds of the property to ensure ongoing compliance.

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.