

To:	Development Management	From:	Paddy O'Neill (AtkinsRéalis)
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Planning App Ref:	PL/2026/02414
Service Ref:	Drainage
Date:	19/05/2026

PROPOSAL

Proposed redevelopment of ancillary buildings for the Kennels

SITE LOCATION

Kennels and Cattery, Goldborough, Broad Town Road, Broad Town, Swindon, SN4 7QX.

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 Town and Country Planning Act 1990 (as amended) (Reference: PLP-00000531; dated: 13/04/2026).
- Existing Block Plan (Drawing no. 05; dated: 10/04/2026).
- Existing Elevations and Floor Plans (Drawing no. 01; dated: 10/04/2026).
- Location Plan (Drawing no. 04; dated: 10/04/2026).
- Location Plan (OS) (Document ref no. #531).
- Proposed Block Plan (Drawing no. 03; dated: 10/04/2026).
- Proposed Drainage Plan (Drawing no. & date not provided).
- Proposed Elevations & Existing-Proposed Floor Plans (Drawing no. 01; dated: 10/04/2026).
- Proposed Foundations and Roof Details (Drawing no. 02; dated: 10/04/2026).

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 is acknowledged that the proposed development acutely increases the hardstanding area of the site, with a soakaway proposed to attenuate surface water flows. It is noted using BGS Mapping that the site is indicated to be underlain by “*slowly permeable seasonally wet... loamy and clayey soils*” with impeded drainage. Information regarding the suitability of infiltration to dispose of surface water has not been provided by the applicant.

RECOMMENDATION

No Objection subject to the following conditions:

1. The applicant is requested to provide soakaway testing in accordance with BRE365, demonstrating the infiltration is feasible (i.e. via soakaway - as specified in the provided Proposed Drainage Plan) 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.
 - An appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.

If the infiltration testing indicates the site is unsuitable for a soakaway in compliance with the [Wiltshire Council Soakaway Guidance](#), the applicant must provide a revised drainage strategy, to be submitted to and approved by the local planning authority, that demonstrates that flood risk will not be increased elsewhere.

INFORMATIVES

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).