

To: Development Management

From: Drainage Team Rohit Singh

Planning App Ref: PL/2026/02932

Service Ref: LLFA

Date: 03/06/2026

PROPOSAL

Construction of a new 4 bedroom dwelling, garage, access, parking and landscaping

SITE LOCATION

The site at garden land to No.144 St Ediths Marsh is located within an established residential area and the submitted application form indicates that the site is not within an area at risk of flooding and is more than 20 m from a watercourse. However, no supporting Environment Agency Flood Map extract or formal Flood Risk Assessment has been provided to verify this position. Given the nature of the site—being part of a larger garden plot with retained hedging, trees, and informal landscaping—it is likely that localised overland flow routes and existing drainage pathways may be present, which have not been explicitly identified or assessed within the submission. Furthermore, such sites can be sensitive to surface water accumulation during intense rainfall events, particularly where new impermeable areas (e.g. dwelling footprint, driveway, terrace) are introduced, potentially altering existing drainage patterns.

From a drainage perspective, the proposal includes a soakaway-based surface water strategy and permeable surfaces, which align with SuDS principles in principle. However, the effectiveness of this approach is dependent on ground infiltration capacity and groundwater conditions, which have not been fully substantiated through site-specific testing. In addition, while no direct interaction with main rivers or mapped Flood Zones 2 or 3 is indicated, the absence of detailed flood mapping and limited assessment of surrounding drainage features means that potential constraints such as shallow groundwater, exceedance flow pathways, or localised surface water issues cannot be ruled out. As such, the site is subject to uncertainty in relation to surface water behaviour and infiltration feasibility, which should be addressed through additional evidence to ensure that flood risk is appropriately managed and not increased elsewhere.

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

- Application Form
- Location plan
- Existing site plan
- Design and Access Statement
- Construction Management Plan
- Construction Management Plan-2
- Proposed drainage plan
- Proposed site plan
- Proposed sections

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.

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

1. Flood Risk and Site Constraints

The application confirms that the site is located on garden land at No.144 St Ediths Marsh and indicates within the form that the site is not at risk of flooding and not within 20 m of a watercourse. However, no supporting **Environment Agency Flood Map extract or site-specific Flood Risk Assessment** has been provided to substantiate this claim. Given the rural/residential edge context and the presence of informal drainage features typically associated with such sites, there remains potential for surface water flow paths and localised drainage constraints that have not been assessed. Without formal confirmation, the site-specific flood risk context cannot be fully verified.

2. Surface Water Drainage Strategy and SuDS Compliance

A drainage strategy has been submitted and proposes infiltration via a cellular soakaway system, sized for the 1 in 100 year +30% climate change event, with a total storage volume of approximately 15.5 m³. Surface water is directed to this soakaway with no discharge off-site, which aligns in principle with the SuDS hierarchy. The proposed drainage plan confirms a soakaway located within the garden area and surface water routed via separate drainage lines.

However, despite the presence of calculations, there is no clear demonstration that runoff rates are restricted to greenfield conditions, nor is there a clear comparison between pre- and post-development runoff. The design assumes 100% impermeable catchment which may represent a conservative approach, but this is not justified or explained within the report. Additionally, no long-term management or exceedance routing strategy is clearly defined.

3. Infiltration Testing and Ground Conditions

The drainage report includes a derived infiltration rate of 0.0045 m/hr, which has been used in the soakaway design. However, there is no evidence that this value is based on site-specific BRE365 infiltration testing, nor is there supporting ground investigation data. The absence of verified infiltration testing is a significant limitation, particularly as the proposed drainage strategy is entirely dependent on infiltration performance. It is therefore unclear whether the soakaway will function effectively in practice or whether groundwater conditions could constrain its performance.

4. Drainage Layout and Integration with Site Design

The proposed site layout includes permeable paving (passing place) and gravel driveway, which are positive SuDS features that can contribute to source control. The drainage plan shows a clear separation between foul drainage (to mains sewer) and surface water (to soakaway). However, the drainage layout lacks sufficient detail regarding:

- Pipe sizing and gradients
- Levels and outfall design
- Construction details of the soakaway
- Relationship with trees/Root Protection Areas (only a note referencing hand digging)

This limits confidence in the technical robustness and buildability of the drainage solution.

5. Surface Water Exceedance and Flood Routing

The drainage report includes modelling of storage performance and indicates that the system performs adequately during the design event, with no flooding predicted within the model. However, there is **no clear exceedance flow plan** demonstrating how flows would behave if the system capacity is exceeded or blocked. There is also no assessment of overland flow routing across the site, nor how ponding would be managed in relation to the dwelling, access, and neighbouring land.

6. Construction Phase Drainage and Management

The Construction Management Plan includes good practice measures such as:

- Wheel washing and runoff control
- Dust suppression with controlled water use
- Managed storage and material handling

However, it does not include a specific temporary drainage strategy during construction, particularly for managing surface water runoff during groundworks. There is no clear statement on how sediment-laden runoff will be prevented from entering adjacent land or drainage systems.

7. Technical Adequacy and Policy Compliance

The submission demonstrates **partial compliance** with drainage policy by proposing a SuDS-based infiltration solution and providing hydraulic modelling. However, it remains **technically incomplete** due to:

- Lack of **verified** infiltration testing (BRE365)
- No greenfield runoff comparison or justification
- Absence of exceedance flow routing assessment
- Limited detail on drainage construction and levels
- No formal confirmation of flood risk classification

As a result, the submission does not yet provide sufficient evidence to demonstrate compliance with NPPF, PPG, and local LLFA requirements, particularly in relation to ensuring that flood risk will not be increased elsewhere.

Overall LLFA Position

The application shows a positive drainage approach in principle, including the use of infiltration SuDS and absence of off-site discharge. However, the submission remains **technically insufficient in its current form**, with key uncertainties around infiltration feasibility, runoff control, and exceedance management.

Further information is required to confirm that the drainage strategy is robust, deliverable, and policy-compliant.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. Whilst a drainage strategy has been submitted proposing infiltration via a soakaway system, key technical evidence is missing to verify its feasibility and ensure compliance with national and local policy. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

1. **Environment Agency Flood Map for Planning Extract** – Required to confirm the site's Flood Zone classification, as no supporting evidence has been provided to verify the applicant's statement that the site is not at risk of flooding.
2. **BRE365 Infiltration Testing and Ground Investigation** – Required to substantiate the infiltration rate used in the drainage design and confirm that soakaway drainage is feasible under site-specific ground and groundwater conditions.
3. **Surface Water Drainage Strategy Clarification (Runoff Rates)** – Required to demonstrate that post-development runoff does not exceed greenfield runoff rates, including justification of the assumption of 100% impermeable area used within the submitted calculations.
4. **Drainage Layout Details (Levels and Construction)** – Required to provide detailed design information including pipe sizes, gradients, invert levels, and construction details of the soakaway, to demonstrate that the system is technically robust and buildable.
5. **Surface Water Exceedance Flow Plan** – Required to demonstrate how exceedance flows will be managed during events beyond the design capacity or in the event of system failure, ensuring no risk to the dwelling or adjacent land.
6. **Assessment of Existing Drainage Features and Flow Paths** – Required to confirm whether any existing overland flow routes, ditches, or informal drainage features are present within or affecting the site, and how these will be maintained or managed post-development.
7. **Construction Phase Surface Water Management Plan** – Required to demonstrate how surface water runoff and sediment will be managed during construction, particularly during groundworks, to prevent pollution or increased flood risk off-site.

Informatives

The following informatives are recommended to accompany any approval:

1. **Surface Water Drainage (SuDS Principles)** – The applicant is advised that surface water from the development should be managed in accordance with the SuDS hierarchy, with preference given to infiltration where feasible. Any drainage design should ensure that

runoff is adequately controlled and does not increase flood risk to adjoining land.

2. **Infiltration Drainage** – Where soakaway drainage is proposed, the applicant should ensure that site-specific infiltration testing is undertaken in accordance with BRE365 to confirm suitability, particularly to account for potential variability in ground conditions and groundwater levels.
3. **Maintenance of Drainage Infrastructure** – The applicant is responsible for ensuring that all drainage features, including soakaways and permeable surfaces, are properly maintained for the lifetime of the development to prevent deterioration in performance and increased flood risk.
4. **Construction Phase Runoff Management** – The applicant is advised to implement appropriate measures during construction to control surface water runoff, sediment, and pollutants, ensuring that no adverse impact occurs to neighbouring land or the highway drainage network.
5. **Works Near Trees and Drainage Features** – Care should be taken during installation of drainage infrastructure in proximity to retained trees and root protection areas, ensuring compliance with arboricultural recommendations and avoiding damage to existing drainage pathways.
6. **Ordinary Watercourse Consent (if applicable)** – Should any works be required within or affecting an ordinary watercourse or land drainage feature, the applicant may need to obtain separate consent from the Lead Local Flood Authority under the Land Drainage Act 1991.