

To:	Jonathan James	From:	Drainage Team
------------	----------------	--------------	---------------

Planning App Ref:	PL/2026/03581
Service Ref:	Drainage
Date:	09/07/2026

PROPOSAL

Discharge of conditions 3 (Surface Water & Drainage), 4 (Sewage Details), 5 (Hard and Soft Landscaping), 7 (Written Scheme of Archaeological Investigation) and 8 (Details of accesses, car parking and turning areas) of PL/2023/07020.

SITE LOCATION

Land to the south at Rose Villa, Rose Villa, Roundway, Devizes, SN10 2HY

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	
Objection	X

APPLICATION DOCUMENTS REVIEWED

- Drainage Strategy Report
- Factual Ground Investigation Report
- PL202307020 - Decision Notice
- PL202307020 - Revised Location and Site Plan

ASSESSMENT OF THE PROPOSAL

Context

In 2026 The LLFA had the following conditions 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 occupied until surface water drainage has been constructed in accordance with the approved scheme.

REASON: To ensure that the development can be adequately drained.

4. No development shall commence on site until details of the works for the disposal of sewerage including the point of connection to the existing public sewer have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be first occupied until the approved sewerage details have been fully implemented in accordance with the approved plans.

REASON: To ensure that the proposal is provided with a satisfactory means of drainage and does not increase the risk of flooding or pose a risk to public health or the environment.

Assessment

The applicant proposes to discharge surface water arising from impermeable surfaces via geocellular attenuation tanks to a trench soakaway. All remaining hardstanding areas are proposed to be constructed with permeable surfaces. The LLFA are concerned that the strategy is entirely reliant on infiltration, given that infiltration testing failed on site. We would find it helpful to understand the drainage arrangements for nearby developments, and at minimum, ensure the drainage design maximises evapotranspiration potential through a drainage strategy that mimics natural processes as closely as possible.

Foul water is to be discharged via a private package treatment plant and connected to a private foul drainage network, with an ultimate discharge to watercourse via a private package treatment plant. The LLFA have no objection to this, but will require evidence that existing permits have been amended accordingly.

RECOMMENDATION

Following a review of the information provided, **Condition 3** cannot be discharged until the applicant provides supporting evidence to address the following requirements:

- Further information regarding drainage arrangements for nearby properties or developments. In particular, how surface water arising from the existing Rose Villa property managed.
- The utility survey identified an existing sewer to the northeast of the site. Given the lack of other discharge options, we would expect the applicant to carry out further survey of this sewer to determine downstream connectivity and discharge potential.
- If the applicant is unable to identify an alternative outfall and still needs to rely on an infiltration-based strategy, we would suggest considering the following:
 - There is little benefit to buried attenuation features. Buried features remove any potential for evapotranspiration. It would be more beneficial to implement a drainage strategy that maximises the use of surface level SuDS such as swales, raingardens, or bioretention basins, as these could be planted and would maximise evapotranspiration potential where actual infiltration on site is going to be very limited.
 - The drainage calculations that the applicant has provided do not accurately represent what will occur during rainfall events. Firstly, the calculations assume an infiltration rate of 1×10^{-6} m/h. This is not the infiltration rate of the soil as per the BRE365 infiltration testing. The infiltration testing showed that trial pits failed to drain down on the first fill. This indicates that it is unlikely storage features will empty in time to manage back-to-back rainfall events. Therefore, back-to-back rainfall events will likely result in exceedance flows, and it will be of upmost importance to ensure that the drainage arrangement mimics the existing flow regime as closely as possible.

Following a review of the information provided, **Condition 4** cannot be discharged until the applicant provides supporting evidence to address the following requirements.

- The application states that foul drainage will discharge to an existing private treatment system. This requires consultation with the EA, see the [EA guidance](#), as existing permits will require amendment. The applicant should provide evidence of this. The applicant can also contact the EA for planning advice at swx.sp@environment-agency.gov.uk.

INFORMATIVES

- 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).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.

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.

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.