

To:	David Cox	From:	Drainage Team
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Planning App Ref:	PL/2026/00899
Service Ref:	Drainage
Date:	02/07/2026

PROPOSAL

Discharge of conditions 3 drainage, 4 samples, 5 until details, 6 surfacing, 7 stopping up of the existing main access & 8 internal boundary treatments of planning application PL/2024/09081 (Replacement of 4 no. terraced cottages with 2 pairs of semi detached two-storey dwellings, with detached garages, associated driveway, parking and amenity space).

SITE LOCATION

Eagle Cottages, Rockley, Marlborough, Wilts, SN8 1RT

APPLICATION DOCUMENTS REVIEWED

- Application Form (MAR 2026)
- Decision Note (PL/2024/09081) (MAR 2026)
- Ground Investigation Report (PL/2024/09081) (MAR 2026)
- Private Drainage Details Sheet 1, 2 & 3 of 3. (MAR 2026)
- Drainage Layout (MAR 2026)
- Drainage Strategy (PL/2024/09081 – Issue 02 – June 2024)
- 6669-C-100 REV B - Drainage LAYOUT (JUN 2026)
- 6669-RP01 ISSUE 02 – DS (JUN 2026)

ASSESSMENT OF THE PROPOSAL

Context

In 2024 The LLFA had the following condition for which information was required before these could be discharged:

3. No development shall take place until full details of drainage, including the location and capacity of any ditches to which attenuated water is to discharge and any permissions agreed with relevant landowners, as well as any other provision that may be necessary to manage flooding risk from any source, has been submitted to and approved in writing by the local planning authority. The development shall not proceed other than in accordance with the approved details.

REASON: To ensure adequate flood risk management on-site and that the scheme does not result in increased flood risk elsewhere, as the submitted Drainage Strategy lacked information as to the location and capacity of drainage ditches into which attenuated water is to be discharged.

Assessment

The applicant has outlined that surface water will be discharged to an existing watercourse at 1l/s, demonstrating adherence to Wiltshire Council's Betterment Policy. The applicant has demonstrated adherence to the drainage disposal hierarchy as infiltration testing has demonstrated this is not a feasible means of surface water disposal. Groundwater was encountered 0.66m below ground level.

The applicant has submitted additional information in response to the previous consultation response, including the updated drainage details Drawing 6669-C-100 Rev B and Drainage Strategy 6669-RP01 Issue 02.

The submitted information addresses a few of the details for Condition 3, demonstrating appropriate exceedance flow routing, confirmation of riparian responsibility, compliance with the Council's betterment policy through reduced discharge rates, consistency between the offline attenuation design and hydraulic modelling, and clear long-term maintenance arrangements. In section 4.24. of the Drainage Strategy (Issue 02), the applicant has stated the site will discharge at 1l/s, providing betterment of 84%, 93% & 95% on the 1 in 1, 30 and 100 year return periods

However, the submitted information does not satisfactorily address the outstanding requirements of Condition 3. In particular, a catchment plan has not been provided, and the response does not constitute an acceptable Construction Management Plan. As such, the condition cannot be discharged.

RECOMMENDATION

Condition 3 cannot be discharged until the following information is submitted and accepted by LLFA

- The applicant must provide a catchment plan, based on appropriate topographic survey information, clearly delineating the contributing catchment area draining to the ordinary watercourse and confirming that no catchment transfer will occur.
- The applicant must submit a Construction Management Plan demonstrating how flood risk and pollution to groundwater and watercourses will be mitigated during construction, including details of surface water management, sediment control and pollution prevention measures.

INFORMATIVES

- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

- The applicant must ensure a copy of the drainage strategy & accompanying maintenance regime is included in the title deeds of the property.
- The application states that foul drainage will discharge to a private treatment system. This requires consultation with the EA, see the [EA guidance](#). The applicant can also contact the EA for pre-planning advice at swx.sp@environment-agency.gov.uk.

In addition, the applicant is required to demonstrate that the proposed discharge from the package treatment plant is in full compliance with the General Binding Rules (for discharge to a drainage field) or that an Environmental Permit from the EA has been obtained.

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.