

To: Development Management

From: Drainage Team Rohit Singh

Planning App Ref: PL/2026/02765 Service Ref: LLFA

Date: 30/07/2026

PROPOSAL

The replacement of two mobile classroom buildings with a new, permanent three-classroom extension

SITE LOCATION

Hullavington C of E Primary School, The Street, Hullavington, Chippenham, SN14 6EF

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
- Drainage Strategy

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

Following review of the submitted Drainage Strategy and associated plans, the proposal is broadly acceptable from a surface water drainage perspective, subject to conditions.

Key Drainage Considerations

Site Constraints

- Ground investigation and BRE365 infiltration testing undertaken in April 2026 demonstrated that the site is underlain by Kellaways/Oxford Clay and infiltration is not feasible.
- The existing school drainage system comprises a combined private drainage network discharging ultimately to the Wessex Water sewer.
- The proposed development seeks to avoid additional discharge to the combined sewer and instead utilise a more sustainable discharge route to the watercourse located along the northern boundary of the site.

Drainage Hierarchy

The applicant has demonstrated consideration of the drainage hierarchy:

1. Infiltration investigated and discounted due to impermeable clay soils.
2. Discharge to surface water body proposed via the adjacent watercourse.
3. Discharge to combined sewer avoided.

This is considered consistent with national and local SuDS principles.

Proposed Surface Water Strategy

The drainage strategy incorporates:

- Permeable paving;
- Raingardens/swales;
- Attenuation storage within the permeable paving structure;
- Controlled discharge to the adjacent watercourse via a flow control chamber.

The proposed discharge is restricted by a 60mm diameter orifice with maximum discharge rates stated as:

- 1 in 1 year: 1.7 l/s;
- 1 in 30 year: 3.3 l/s;
- 1 in 100 year +40% climate change: 3.9 l/s

Exceedance Flows

The drainage strategy includes exceedance flow routing and states that exceedance flows will be directed away from buildings such that properties are not placed at risk of flooding during events exceeding the design standard.

Information Gaps

While the overall approach is acceptable, the submitted information appears relatively high-level for a full planning application. The drainage strategy references drainage calculations being included within appendices; however, these were not evident within the documentation reviewed.

Prior to commencement, detailed drainage design should therefore be secured by condition, including:

- Final drainage calculations;
- Detailed SuDS design;
- Hydraulic sizing of attenuation features;
- Flow control specifications;
- Sections and construction details for raingardens and permeable paving;
- Long-term maintenance arrangements;
- Outfall details to the receiving watercourse.

RECOMMENDATION

No objection subject to the following conditions

No development shall commence until a detailed surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the principles set out within the Drainage Strategy prepared by SWJ Consulting Engineers (Ref. 2425-SWJ-XX-HSXX-RP-C-0500 Revision P01 dated 27 April 2026) and shall include:

- Detailed hydraulic calculations for all events up to and including the 1 in 100 year plus 40% climate change event;
- Construction details of all SuDS components;
- Flow control details;
- Exceedance flow routing;
- Outfall details;
- A management and maintenance plan for the lifetime of the development.

The approved scheme shall be implemented prior to first use of the development and maintained thereafter in accordance with the approved details.

Informatives

[include any additional information relevant or helpful to the applicant, that does not need to be covered by objections and/or conditions]