

To:	Joe Richardson	From:	Drainage Team
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Planning App Ref:	PL/2026/00843
Service Ref:	Drainage
Date:	13/07/2026

PROPOSAL

Detailed Planning application for the erection of 9 no. dwellings including 4 Affordable Homes with associated infrastructure.

SITE LOCATION

Land at Whitlocks, Bishopstone, Wiltshire

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
- Flood Risk Assessment
- Landscape and Visual Assessment
- Landscape Masterplan
- Layout Drawing Plan
- Location and Proposed - Existing Block Plan
- Location & Site Block Plans
- Plot 1 - Elevations and Floor Plans
- Plot 2 - Elevations and Floor Plans
- Plot 7 - Elevations and Floor Plans
- Plot 8 - Elevations and Floor Plans
- Plot 9 - Elevations and Floor Plans
- Plot 7 - Elevations and Floor Plans
- Plots 3 and 4 - Elevations and Floor Plans
- Plots 5 and 6 - Elevations and Floor Plans
- Planning Statement
- Planning Support Document
- Planning Support Document-2
- Proposed Block Plan
- Proposed Site Plan
- Proposed Site Section
- Topographic Survey

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.

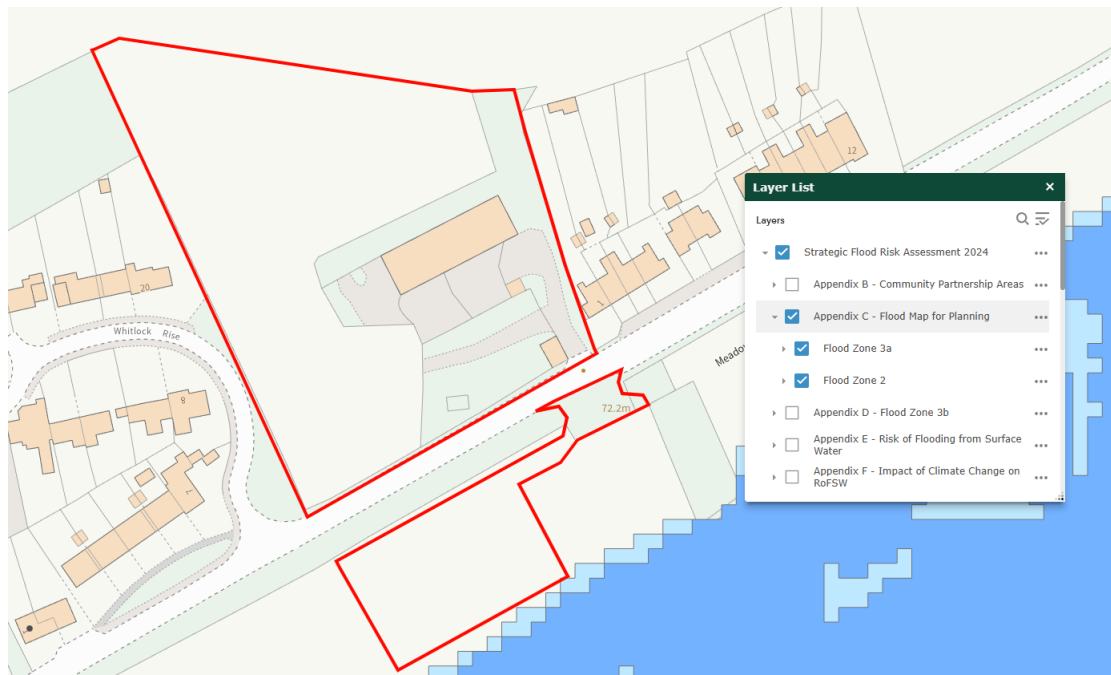
The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

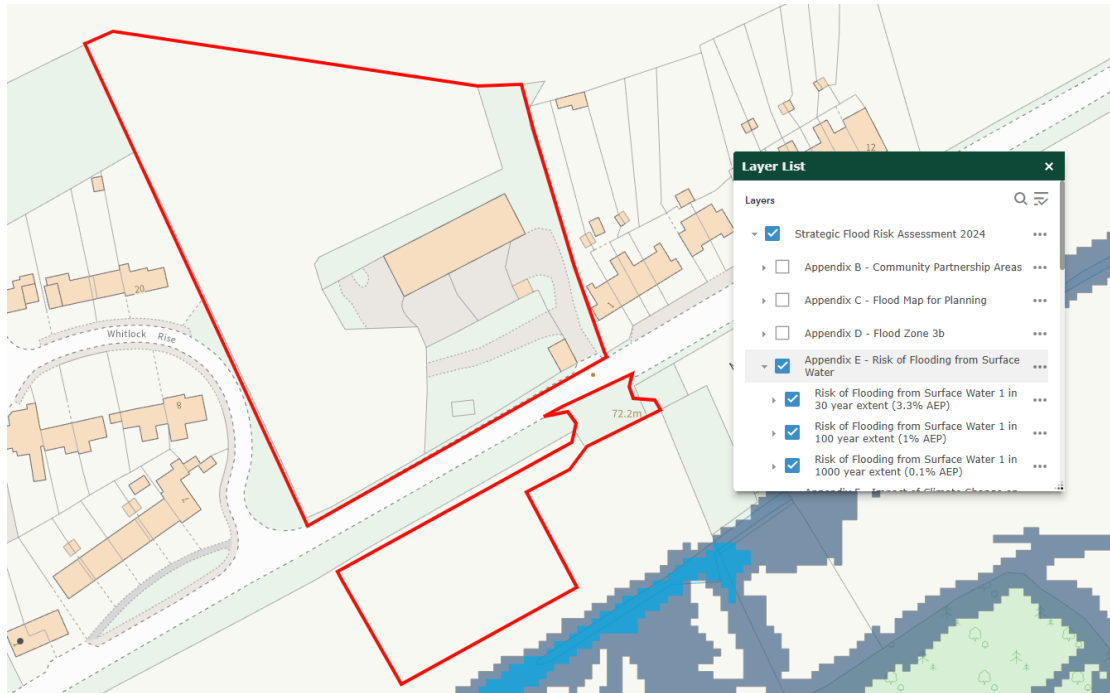
Assessment

The application has been supported with a Site Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors. The developer, or agent working on their behalf, retains the responsibility for the checking of the design, calculations and details contained in the FRA and additional submitted information.

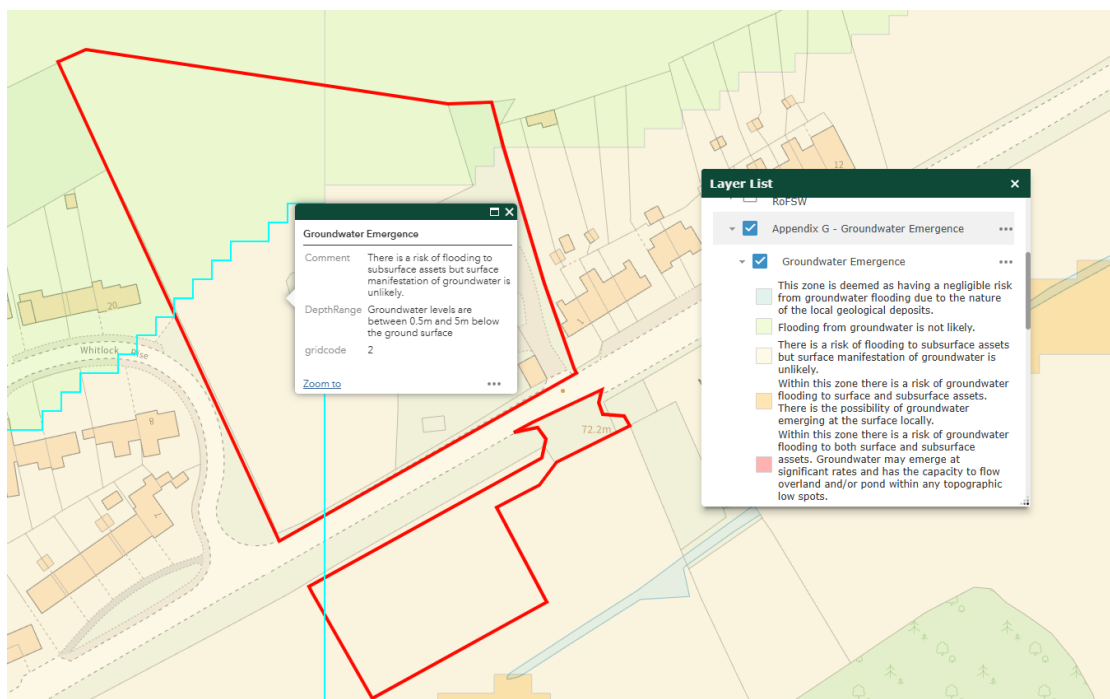
The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and has a low level of risk from fluvial flooding.



The site has a low level of risk from surface water flooding.



The site has medium risk of flooding from ground water flooding; the groundwater levels are between 0.5m and 5m below the ground surface.



The FRA concludes that there will be low flood risk overall.

The applicant intends to discharge surface water from the site through permeable paving. Infiltration testing has been carried out on site and these tests indicate sufficient infiltration rates. However, it is understood that the applicant intends to carry out further testing in accordance with BRE365 guidance, to inform the detailed design of the permeable paving and subsequent modelling of the network.

Infiltration is currently being proposed within 10m of building foundations and existing roads. This is not in accordance with soakaway guidance, which recommends a 10m clearance is maintained in chalk unless a geotechnical expert has assessed otherwise. We would expect the applicant to provide evidence that a geotechnical assessment has been undertaken to support the use of infiltration techniques in proximity to building foundations.

It is noted that the applicant has provided an exceedance flow plan. However, this only shows exceedance flows on the parking areas and roads. We would expect to see detailed exceedance routing around properties that demonstrates that overland flows are not directed towards properties. The applicant has also shown proposed FFL's on the drainage plan. All FFL's must be set at minimum 150mm above the adjacent ground level, or above the closest SW cover level. This is not currently the case.

The drainage strategy layout states that the access road is constructed on an 8% gradient. Permeable paving becomes less effective on steeper slopes, creating a risk that surface water runoff from the access road will flow toward the highway. Although the applicant proposes to install gullies to address this, they must provide evidence that all runoff can be intercepted and managed within the site for events up to the 1 in 100-year storm plus climate change allowance.

The FRA states that foul water is to be treated by a package treatment plant & treated effluent is to discharge either to an adjacent field ditch or to ground via a soakaway system. Furthermore, the Nutrient Neutrality Mitigation Strategy Report and Habitat Regulations Assessment confirm that the total pollution risk score is 170, which is below the threshold specified in the CIRIA SuDS Standards.

No objection subject to the following conditions

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.**

In order to discharge the above drainage condition the following additional information must be provided:

- Evidence that soakage tests have been undertaken in accordance with BRE 365 to demonstrate that infiltration is feasible 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
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.
- Evidence that groundwater monitoring has been carried out, that accounts for seasonal variation, to confirm at least 1m between the base of any soakaway and the maximum groundwater level in accordance with soakaway guidance.
- The site is underlain by chalk. In chalk, or any other fill material prone to instability, soakaways should be sited at least 10 m away from any building, road or structure foundations, in line with CIRIA C574 Engineering in Chalk and in accordance with Standard 7 of the National Standards for SuDS. Deviance from this will only be supported if recommended following a geotechnical assessment.
- A pre and post development exceedance plan showing overland exceedance routes that minimise the risk of people and property.
- Evidence that all FFL's are at minimum 150mm above the adjacent ground level or closest SW cover level.
- A detailed drainage plan showing how properties will discharge rainwater to the proposed permeable paving and how drainage will be configured within the access road to ensure that surface water does not run onto the highway.

- 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.

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).
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.

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.