

From: Simon Wilson [REDACTED]
Sent: 31 July 2026 20:37
To: James, Jonathan <Jonathan.James@wiltshire.gov.uk>; Matt Tucker [REDACTED]
Subject: RE: PL/2026/03581 - DoC Rose Villa, Roundway

Hi Jonathan,

Hope you had a good break.

Further to the LLFA's comments received a few weeks back, our drainage consultant has now prepared a response addressing the queries and concerns raised regarding the proposed drainage details at the site. Please could you pass the response, which is attached to the email below, onto the relevant people for their review.

I appreciate you will be catching up on emails upon your return next week, but I would also be grateful if you could let us know whether there are any further outstanding consultee comments to be received, or any other matters that need to be addressed before a decision can be made. If you could let us know early next week that would be greatly appreciated.

Furthermore, I am also conscious that today (31 July) was the determination deadline for the DoC application. As such, would you be agreeable to a two-week EoT until Friday 14 August? This should hopefully provide the LLFA with sufficient time to review the additional information submitted and provide their response. Given the limited scale of the development and the LLFA's previous review of the site, we would hope that this timeframe is reasonable.

--- Response to LLFA Comments ---

Please find below our response to LLFA comments with regards to Rose Villa, Roundway (PL/2026/03581).

Wiltshire LLFA comments 14.07.26	WCI response 31.07.26
Condition 3 – Surface Water Drainage	
1. Existing drainage arrangements ○ Further information regarding the drainage arrangements serving nearby properties and developments, particularly Rose Villa, including how surface water is currently managed.	Existing sewage A sewage map for the properties to the east of Folly Road has been provided in Appendix B of the drainage strategy report. Neighbouring properties, Rose Cottage and Rose Villa are known to discharge to a septic tank before ultimately connecting to the Roundway business park’s piped foul network (private) before being treated again through a treatment plant and discharged to a ditch under a permit. Sewage for the properties to the west of Folly Road, it can only be assumed that they discharge to private treatment and then to ground. This would be a safe assumption due to a lack of public foul sewers and watercourses in close proximity to the properties. In any event, alternative arrangements to properties to the west are not material to the consideration of the drainage conditions to this application.

	Existing surface water Road gullies were noted along Folley Road which would likely connect to highway drainage maintained by Wiltshire Council highways. It is unclear as to how neighbouring properties Rose Cottage and Rose Villa manages surface water – Access to these properties is not permitted and cannot be validated. However, similar to the foul it would be safe to assume that rainfall is collected and discharged to ground via a house soakaway which would be common for a house of this age, as there are no public storm sewers or watercourses near to the site. There is also no evidence that surface water run-off is combined with the foul water from these properties. Again, the surface water drainage arrangements outside of the scope of this application should not influence the positive determination of this condition.
2. Existing drainage infrastructure ○ The submitted utility survey identifies an existing sewer/drainage feature to the north-east of the site. Please provide further investigation, including details of downstream connectivity	An extract from the utility trace has been provided below for the existing drainage in question. These pipes are currently redundant with no flow. The connectivity of these pipes is unknown and access beyond the boundary towards the outfall is not permitted and cannot be validated.

and an assessment of whether this asset could provide a feasible discharge route.

It is assumed that these pipes may have previously taken rainwater runoff from the private access track and then discharged to a possible soakaway located in the garden of Rose Villa – As the topology of the area falls from north to south, it is not anticipated that the discharge would have been that much further north without there being significantly deep drainage – Similar to the above discussion, as there are no other discharge points, it is a safe assumption that this discharges to ground on the neighbouring site.

It is proposed to maintain these pipes within the development area, however to ensure that the proposed run-off does not inundate the possible neighbouring soakaway, a new strategy is proposed.

- The submitted strategy relies upon infiltration, notwithstanding the submitted ground investigation and infiltration testing which indicated that infiltration drainage may not be feasible. Please provide further technical justification demonstrating that the proposed drainage system will operate effectively, including evidence to justify the infiltration assumptions used within the drainage calculations and confirmation that the system can adequately accommodate successive rainfall events.

It is acknowledged that the proposed strategy is bespoke and relies on mimicking the current scenario as much as possible with a pragmatic view.

As noted in the drainage strategy report, we are looking to attenuate flows as close to greenfield run-off as possible (as per the current scenario) at 0.5l/sec for up to the 1 in 100-year event + climate change, whilst not introducing risk of flooding through blockage risk at the flow control.

By discharging the resultant flow to ground through a soakaway, we would be mimicking as close as feasible the current scenario. It is appreciated that the results from the ground investigation resulted in a failed test in accordance with BRE Digest 365, but clearly there is infiltration, albeit slow, as there has been no reports of surface water flooding at the site, and neighbouring properties are also likely discharging to ground without a flow control.

Infiltration assumptions

In lieu of a usable infiltration rate through ground investigations, we have used 1×10^{-6} m/s which is a rate referenced within the National Standard for SuDS (section 3.14) as being the limit for infiltration features.

Resultant outflows

By combining the restricted flow rate and discharge to soakaway, it must be noted that the outflow would be less than 0.0l/s up to the 1 in 100 year + 45% climate change – See below.

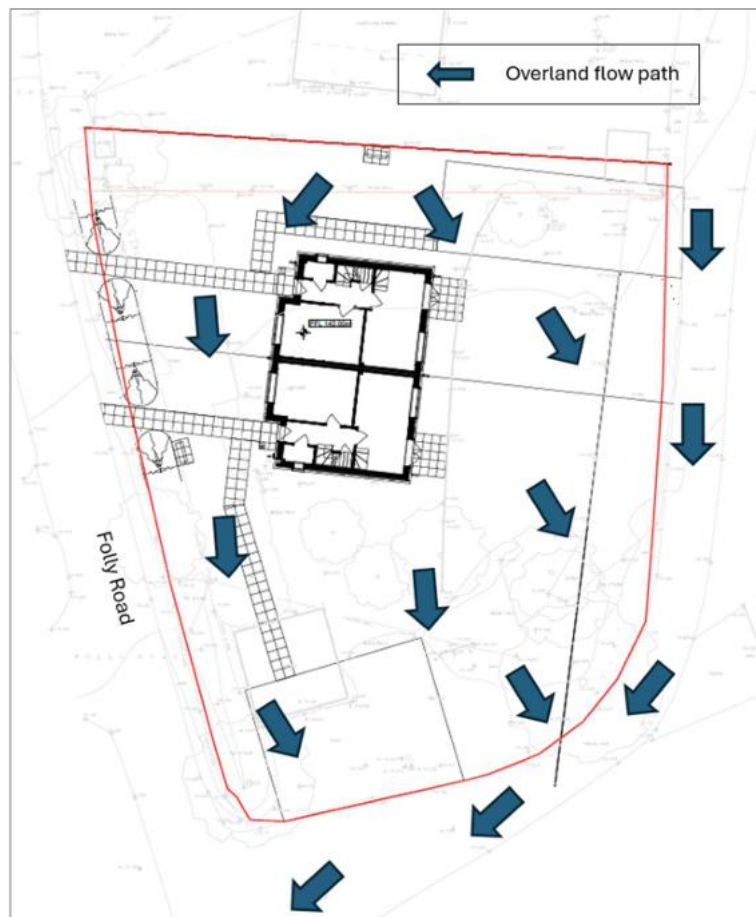
Results for 100 year +45% CC Critical Storm Duration. Lowest mass balance: 91.28%

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m³)	Flood (m³)	Status
60 minute winter	Geocellular (plot 1)	49	141.961	0.712	2.0	1.6320	0.0000	FLOOD RISK
600 minute winter	Geocellular (plot 2)	570	141.556	0.896	0.4	1.6373	0.0000	FLOOD RISK
600 minute winter	Soakaway (offsite)	585	141.546	0.899	0.5	6.7823	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m³)
60 minute winter	Geocellular (plot 1)	plot 1	Soakaway (offsite)	0.5	1.054	0.022	0.0006
600 minute winter	Geocellular (plot 2)	plot 2	Soakaway (offsite)	0.5	0.354	0.085	0.0101
600 minute winter	Soakaway (offsite)	Infiltration		0.0			

Successive rainfall events

Half empty times for the 3.3% AEP is 45hrs which is greater than the stipulated 24hrs in the National Standards for SuDS. The exceedance route in these rare events would be as shown in figure 2 of the drainage strategy report – see below for reference.



4. Alternative SuDS measures

- In the event that infiltration remains the

Surface level SuDS features have been considered and are limited due to constraints surrounding the High Voltage electricity cable that runs through the middle of the back garden, north to south vice versa.

proposed discharge mechanism, consideration should be given to incorporating surface-level SuDS features (such as bioretention, rain gardens, swales or similar measures) to maximise evapotranspiration and better replicate natural drainage processes. Details should be submitted where appropriate.	Rainwater butts to be included to provide relief in the summer months and additional attenuation.
Condition 4 – Sewerage Details	
1. Environment Agency permitting ○ The submitted drainage strategy confirms that foul drainage will ultimately connect to an existing private treatment system which discharges to a watercourse. Please provide evidence of	The applicant understands the requirement to meet Environmental Permitting Regulations (EPR), and that this needs to be in place prior to occupation of the development. Obtaining Environmental permit falls outside of the scope of the Town and Country (Development Management Procedure) (England) Order 2015 and the determination of this application. It is therefore reasonable that in approving the condition detail that the LPA reminds the applicant of its requirements to secure the relevant permit, i.e., similar to an informative.

engagement with the Environment Agency and confirmation that any necessary environmental permits have been amended, or can be amended, to accommodate the additional flows arising from the development.	As this is a planning application we do not believe it is necessary at this stage to obtain or being the process of amending the permit. The applicant will ensure that any upgrades works, where required, are made to adhere to EPR. We therefore see this as an informative response as part of the planning application, please confirm that this is the case.
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Kind Regards,

Simon

Simon Wilson
Graduate Planner
Planning