

To:	Jonathan James	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/01199
Service Ref:	Drainage
Date:	14/08/2026

PROPOSAL

Full application

To erect a 4 bedroom detached house with a 3 bay detached garage with room above. New vehicular access and drive. Landscaping.

SITE LOCATION

Land South of Tudor Cottage, Park Lane, Cherhill

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	X
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form (*Feb 2026*)
- Design And Access Statement (*Feb 2026*)
- Drainage Maintenance and Management Plan (*Jul 2026*)
- Drainage Plan (*Jul 2026*)
- Drainage Strategy (*Jul 2026*)
- Existing Site Plan (*May 2026*)
- Final Coordinated Submission Letter (*Jul 2026*)
- Location Plan (*May 2026*)
- Proposed Site Plan (*Jul 2026*)
- Proposed Soakaway Design Statement (*Jul 2026*)
- Water Borehole Prognosis (*May 2026*)

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

According to SFRA, the proposed site is within Flood Zone 1 and has a low risk of surface water flooding and a medium risk of groundwater flooding.

The submitted Drainage Strategy proposes the use of infiltration-based SuDS (e.g. soakaways) along with rainwater harvesting systems as the primary method for surface water disposal. The application is supported by a desk-based hydrogeological assessment. While the geological context (chalk bedrock, absence of superficial deposits, and deep groundwater levels) indicates that infiltration may be feasible, the current submission does not include any site-specific infiltration testing results.

The LLFA acknowledges the applicant's willingness to undertake BRE365 infiltration testing and detailed soakaway design prior to construction. However, whilst the submitted Hydrogeological Assessment indicates potential suitability for infiltration drainage, this has not been confirmed through site-specific infiltration testing. Given that the proposed drainage strategy is wholly dependent on infiltration, the LLFA considers that evidence of infiltration viability is required at this stage to establish that the strategy is achievable in principle. In the absence of infiltration testing results, the LLFA cannot be satisfied that the proposed drainage strategy is feasible and therefore is unable to remove its objection at this stage.

The applicant has not provided calculations demonstrating that the proposed soakaway, ACO drain and French drain have been sized appropriately to accommodate and manage the required surface water runoff.

The applicant has provided a cross-sectional drawing of the proposed soakaway; however, equivalent cross-sectional details have not been provided for the ACO drain or the French drain.

The applicant has not provided details of the proposed French drain serving the site access, including its point of discharge and the means by which the collected surface water will be managed. This information is required to demonstrate that runoff can be conveyed and disposed of safely without increasing flood risk.

The applicant has reiterated that exceedance flows will be directed away from buildings and managed on site. However, no exceedance routing plan has been provided to demonstrate how runoff would be conveyed during events exceeding the design capacity of the drainage system. The LLFA requires a plan showing exceedance flow routes, flow directions, and any areas of temporary ponding/storage to verify that flows will be managed safely on site without increasing flood risk to buildings, infrastructure, or adjacent land. A narrative statement alone is insufficient to demonstrate compliance with Standard 3 of the National Standards for SuDS.

RECOMMENDATION

Holding objection as further information required

At this stage, the following documents/information are required to further review the drainage and flood risk aspects of the development:

- 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 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 the correct clearances have been adhered to. 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.

This information is necessary given that the applicant intends to discharge all surface water via infiltration, with no feasible alternative discharge routes identified.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

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:

- Calculations that demonstrate adequate sizing of the proposed soakaway/infiltration drainage, ACO drain, French drain and rainwater harvesting system, and cross section drawings of these features.
- The applicant must outline where the French drain across the site access point outfalls surface water to, and how this is safely managed
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- 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 accordance with Standard 4 of National Standards for SuDS, where runoff is collected within rainwater harvesting features, designs shall incorporate the treatment required for any proposed usage with reference to industry published guidance.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the [Wiltshire Guidance](#).
- 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.
- A copy of the agreed drainage strategy & accompanying maintenance regime to be included in the title deeds of the property

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.