

To:	Jemma Foster	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/02268
Service Ref:	Drainage
Date:	28/08/2026

PROPOSAL

Full planning permission

Erection of two detached dwellings with new access and associated works

SITE LOCATION

Land West of North Lodge, 128 High Street, Codford St Peter, BA12 0NJ

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 (*Apr 2026*)
- Design Access & Heritage Statement (*Apr 2026*)
- Drainage Statement (*Apr 2026*)
- Exceedance Routes Plan (*Apr 2026*)
- Existing Site Plan (*Apr 2026*)
- Location Plan (*Apr 2026*)
- Percolation Results (*Apr 2026*)
- Proposed Drainage Levels & Trial Hole (*Apr 2026*)
- Proposed Roof Plans (*Aug 2026*)
- Proposed Site plan (*Aug 2026*)
- Stormwater Calculation (*Apr 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

The proposal seeks permission to construct two individually designed, contemporary two-storey family homes.

According to the drainage statement, the site is located within Flood Zone 1, indicating a low risk of fluvial flooding. The site is also reported to have no significant risk of surface water flooding; however, it is identified as being at high risk of groundwater flooding.

The applicant proposes to dispose of surface water runoff through a soakaway system. The applicant also incorporates sedum-covered flat roofing systems and permeable driveway areas to help reduce surface water runoff and enable a gradual discharge into the proposed soakaway.

A trial pit investigation confirmed that no groundwater was encountered to a depth of 2.2 m below ground level, which is approximately 1.0 m below the proposed soakaway base, thereby providing adequate clearance from groundwater. Although a percolation test has been submitted to support the sizing of the linear drainage trench for foul water disposal, additional soakage testing in accordance with BRE Digest 365 is required to verify the suitability of infiltration. An infiltration rate of 1.94×10^{-5} has been adopted in the soakaway design; however, the basis for this value has not been provided and requires justification.

RECOMMENDATION

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

- It is noted the applicant has included an exceedance route plan; however, this does not provide sufficient detail. The applicant must provide a plan overlaying exceedance flows on top of the proposed site plan, demonstrating that flood risk is not increased elsewhere.
- Items related to proposed soakaways:
 - Raw data from soil testing to validate the infiltration rates adopted within the drainage design.
 - 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
 - As the area to be drained is 367m², and the drainage strategy is reliant on infiltration, the applicant must adopt a factor of safety of 3 in line with CIRIA C753 (Table 25.2) guidance.

TABLE 25.2 Suggested factors of safety, F, for use in hydraulic design of infiltration systems (designed using Bettess (1996). Note: not relevant for BRE method)

Size of area to be drained	Consequences of failure		
	No damage or inconvenience	Minor damage to external areas or inconvenience (eg surface water on car parking)	Damage to buildings or structures, or major inconvenience (eg flooding of roads)
< 100 m ²	1.5	2	10
100–1000 m ²	1.5	3	10
> 1000 m ²	1.5	5	10

(National Standards for SuDS: Standard 3: management of extreme rainfall and flooding, paragraph 3.14-3.17).

- 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.
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

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).
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the [Wiltshire Guidance](#)
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- 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.