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Planning App Ref:	PL/2025/08977
Service Ref:	Drainage
Date:	02/01/2026

PROPOSAL

Full application for Erection of 4 no. new dwellings with associated access, parking, landscaping and private amenity space.

SITE LOCATION

Land in East Grafton (to the north of the A338), East Grafton, SN8 3DB

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
- Block Plan
- Location Plan
- Site Plan
- Design Scheme - Garages plots 1, 2 & 4
- Design Scheme - Plot 1 - elevations and floor plans
- Design Scheme - Plot 2 - elevations and floor plans
- Design Scheme - Plot 3 - elevations and floor plans
- Design Scheme - Plot 4 - elevations and floor plans
- Topographical survey
- Planning Statement
- Flood risk assessment and drainage strategy

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.

As per the submitted FRA, The Site lies within Flood Zone 1. The FRA highlights two localised areas of surface water flood risk on The Site, where risk of ponding up to 20cm is noted. The LLFA's pre-application advice (provided for ENQ/2024/01201) highlighted groundwater flood risk on The Site, but the applicant has not provided any details regarding this. We would expect the applicant to provide evidence to confirm groundwater levels on the site, to inform the drainage strategy. The applicant has stated that in the event of groundwater emergence, exceedance flows are to be conveyed away from the development towards the western boundary, as per the topography of the site.

The proposed development is for the erection of 4 no. new dwellings with associated access, parking, landscaping and private amenity space. The applicant has submitted a Storm Water Drainage Strategy stating that surface water from the proposed development will be managed through infiltration. The access roads and driveways within the site are proposed to be constructed as permeable surfaces, while roof water will be discharged via a soakaway. The soakaway is positioned 5 meters away from the dwellings and from the site boundary.

Infiltration test results under Appendix C of the submitted flood risk assessment and drainage strategy are missing.

Foul water is to be disposed of to the foul water public sewer within the adjacent public highway, the A338. Sewer records received from Thames Water illustrate that a gravity connection from the Site is feasible.

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, Non Statutory Technical Standards for SuDS 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:

- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at 150mm height above the SW drainage cover levels
- Groundwater level data based on groundwater level monitoring (taking into account seasonal variations).
- Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.
- Evidence that soakage tests have been undertaken in accordance with BRE 365 to demonstrate that infiltration is feasible.
- Cross section and standard detail drawings should be provided for proposed attenuation, conveyance or infiltration features and their components.

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).
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- The application states that foul drainage will be discharged to a public sewer. This requires consultation with the sewerage undertaker for the area.

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 out 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.