

To:	Development Management	From:	Drainage Team (AtkinsRéalis)
------------	------------------------	--------------	------------------------------

Planning App Ref:	PL/2025/09915
Service Ref:	Drainage
Date:	28/01/2026

PROPOSAL

Retrospective full application for erection of one dwelling (not built in accordance with consent ref: 18/10970/FUL) (resubmission of PL/2024/02925).

SITE LOCATION

Little Orchard, Lower Kingsdown Road, Kingsdown, Corsham, SN13 8BD.

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 for Planning Permission (Application Form Redacted; dated 19/12/2025).
- Block Plans & Location Plan (Drawing No.: 900/CAM/2018/2 Rev. C).
- Elevations & Floor Plans – existing (Drawing No. 900/CAM/2018/1 Rev. UNK).
- Elevations & Floor Plans - proposed (Drawing No. 900/CAM/2018/2 Rev. F).
- Flood Risk Assessment and Drainage Strategy – prepared by Cole Easdon (Dated December 2025, Issue No. 1). Including:
 - Appendix 1: Surface Water Drainage Layout (Drawing No. 10668-501Rev. UNK).
 - Appendix 2: Surface Water Drainage Calculations (dated 02/12/2025).
 - Appendix 3: BRE365 Infiltration Testing – prepared by Paddock Geo Engineering (dated November 2025).

Also referenced:

- Decision Notice: PL/2024/02925 (Dated 07/08/2024).

ASSESSMENT OF THE PROPOSAL

Context

In December 2025, the applicant re-submitted a request for retrospective planning permission for the erected single dwelling at the site (not built in accordance with planning consent reference 18/10970/FUL). The original submission (PL/2024/02925) was refused for the following reasons:

1. The proposed development, by reason of its location would be contrary to the settlement, delivery and community area strategies and residential development in the open countryside policy and is unacceptable in principle. The proposal fails to accord with Core Policy 1, 2 and 11 of the adopted Wiltshire Core Strategy (Jan 2015), and Saved Policy H4 of the North Wiltshire Local Plan 2011.
2. The proposed (retrospective) new dwelling is inappropriate development within the Green Belt which is, by definition, harmful. The new dwelling does not comply with the replacement building criteria of paragraph 154 d) of the National Planning Policy Framework. The proposed (retrospective) new dwelling is materially larger than the one it has replaced, and is therefore, by definition inappropriate development which conflicts with the purpose of the Green Belt. The application fails to demonstrate that there are any material considerations or very special circumstances that exist to outweigh this harm and overcome the presumption against such development. The proposal is contrary to Section 13, Paragraphs 142, 143, 152, 153, & 154 of the National Planning Policy Framework (Dec 2023).
3. The proposed raised terrace/decking area causes an adverse impact to the amenity of adjoining neighbours in terms of privacy due to the overlooking and sense of overlooking from the terrace/decking area. There is a lack of screening to protect the privacy of neighbours. The proposal is contrary to Core Policy 57 vii of the Wiltshire Core Strategy (Jan 2015).

It is noted that the above do not directly relate to drainage / flood risk.

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) and Drainage Strategy. 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 provided drainage strategy outlines the proposed SuDS implementation at the site, detailing the installation of a soakaway chamber supported by modelling and BRE365 infiltration testing, and exceedance routing that resembles the previous behaviour at the site. However it is noted that the site has undergone substantial earth movements, such as the construction of the proposed basement. Such earth movements have the potential to alter the existing overland paths, ground infiltration capacity, and thus flood risk to people & property.

RECOMMENDATION

No objection subject to conditions

From the details provided by the applicant, additional information is required from the applicant to assess the impact of the development regarding to flood risk. It is requested that the applicant provides:

1. Exceedance routing following the completion of all earthworks and excavation that demonstrate how the pre-development scenario is replicated and does not increase flood risk to adjacent property.
2. Confirmation that the performance of the final constructed cellular soakaway is consistent with the infiltration testing carried out on the 5th November 2025 by Paddock Geo Engineering (Appendix 3 of the provided FRA) following the completion of all earthworks and excavation.

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.

--

Paddy O'Neill (AtkinsRéalis on behalf of Wiltshire Council Drainage).