

To:	David Millinship	From:	Drainage Team
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Planning App Ref:	PL/2026/00442
Service Ref:	Drainage
Date:	27/02/2026

PROPOSAL

Technical Details Consent for the erection of 2no. dwellings with associated access, parking, turning, landscaping and private amenity space – and removal of existing barns (following the approval of PL/2025/06697)

SITE LOCATION

Land at Newlands Farm, Rodbourne Road, Corston, Malmesbury, SN16 0HB

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 Redacted
- Covering Letter
- Existing Site Plan and Location Plan
- Planning Design and Access Statement
- Proposed Site Plan

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 not 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 document submitted, and we do not take any responsibility for incorrect data or interpretation made by the authors.

The application proposes to demolish the existing barns and construct two new dwellings with associated garages, access, parking and landscaping. As outlined in section 6.35 of the Planning, Design and Access Statement, all surface water from the site will discharge to on-site soakaways. The applicant also outlines that the dwellings will connect to the existing mains drainage. The LLFA are assuming this relates to foul water – if not, the applicant must state otherwise.

A holding objection is recommended as there is no drainage strategy submitted. Consequently, the applicant is yet to demonstrate that there is a feasible drainage strategy that safely manages flood risk to people & property.

RECOMMENDATION: Holding objection

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to review the drainage and flood risk aspects of the proposal:

- The applicant must clarify how surface water will be disposed of from the site. The applicant must ensure all proposals align with the National Standards for SuDS: [Standard 1: runoff destinations](#). The LLFA will not accept discharging surface water flows to the mains sewer.
- The applicant must provide a drawing of all the existing drainage features on site, and another detailed drawing including all proposed drainage features, including levels, gradients, pipe diameters, invert levels and the position of soakaways or attenuation features to demonstrate the proposed drainage strategy.
- Evidence that Soil percolation tests/soakage tests have been undertaken in accordance with Building Regulations / BRE 365, and confirmation of infiltration rates. (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14-3.15)

Evidence or calculations to demonstrate that the soakaway has been designed for:

- 1 in 100yr + cc flows
- Half drain time <24hrs
- Highest groundwater level at least 1m from base of the soakaway
- Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.

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).

- The applicant must provide cross-section drawings for all proposed surface water drainage features to demonstrate they are designed in accordance with industry standards.
- The applicant must provide an exceedance flow routing plan for the 1 in 100+CC event, demonstrating that flood risk to people & property is safely mitigated, without increasing flood risk elsewhere (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))
- The applicant must submit clear arrangements for the frequency of ongoing maintenance activities of the proposed drainage system (including SuDS features) over the lifetime of the development (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

INFORMATIVES

- All new drainage will need to comply fully with Building Regulations Part H.
- The applicant must ensure a copy of the agreed drainage strategy and associated maintenance regime are included in the title deeds of the property.
- The proposed foul connection and discharge rate must be discussed and formally agreed with the relevant sewerage undertaker
- The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption of infiltration drainage features.
- Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

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 sets 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.