

To:	Adrian Smith	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/00782
Service Ref:	Drainage
Date:	06/03/2026

PROPOSAL

Full application

The erection of 8 dwellings and associated infrastructure.

SITE LOCATION

Land at Sling Road, Bulford, Wiltshire, SP4 9AP

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

- Design and Access Statement
- Existing Block Plan
- Flood Risk Assessment and Drainage Strategy
- Location Plan
- Planning Statement
- Proposed Block 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 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.

The applicant states that the site lies entirely within Flood Zone 1 and is therefore at low risk from all sources of flooding, requiring only precautionary measures such as setting finished floor levels 150 mm above ground level.

The applicant intends to manage stormwater through a Sustainable Drainage System incorporating permeable paving and an infiltration basin (with a geocellular tank base), designed to accommodate storms up to the 1 in 100-year event with a 40% climate change allowance, while also ensuring that exceedance flows are directed safely away from buildings. In addition, the applicant confirms that the proposals incorporate a rainwater reuse strategy (property level water butts), for use in non-potable household functions.

Since infiltration testing in accordance with BRE Digest 365 has not been carried out on site, applicant notes a conservative figure of 5mm/hr has been considered.

The applicant indicates that no surface water sewers are available locally and that the nearest watercourse is too distant to be utilised as a discharge point. Consequently, infiltration represents the sole feasible means of surface water disposal, with no alternative outfall option available.

RECOMMENDATION

Holding objection as further information required

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

1. 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
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.
2. 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/permeable paving.

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

INFORMATIVES

- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the [Wiltshire Guidance](#).

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.