

To:	Steven Vellance	From:	Rahul Dixit
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Planning App Ref:	PL/2025/08773
Service Ref:	Drainage
Date:	11/03/2026

PROPOSAL

Full application for erection of livestock building, agricultural storage building and associated works – revised scheme to PL/2025/02802

SITE LOCATION

LOWER DUNGE FARM, BRATTON ROAD, WEST ASHTON, TROWBRIDGE, BA14 6AX

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 (Nov 2025)
- Block Plan (Nov 2025)
- Location Plan (Nov 2025)
- Consented Scheme Location Plan (Nov 2025)
- Livestock – Floorplan (Nov 2025)
- Livestock – Elevations (Nov 2025)
- Store – Floorplan (Nov 2025)
- Store – Elevations (Nov 2025)
- PL-2025-02802 Decision Notice (Nov 2025)
- Planning Design and Access Statement V2 (Feb 2026)
- Surface water strategy (Feb 2026)
- Proposed Drainage Strategy (Feb 2026)
- Drainage Details (Feb 2026)
- Basin Details (Feb 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

According to the SFRA, the proposed site is in Flood Zone 1 and is not subject to surface water or groundwater flood risk.

The applicant has reconsulted with additional documents; the updated submission provides proposed drainage strategy details addressing the issues raised in the previous drainage response issued on 02/01/2026.

This application is to replace the existing consented scheme Ref: PL/2025/02802. The applicant currently benefits from a consented scheme to erect a new livestock building & agricultural storage building upon the Lower Dunge Farm but rather than actioning the permission, they now seek permission to erect the livestock building & storage building in a different location upon the Farm. It should be noted that the LLFA were not consulted on the original application for PL/2025/02802.

The consented livestock building measured 100' x 124'. The revised proposal increases the footprint to 151' x 124' to incorporate a covered cattle handling area within the same structure, improving operational efficiency and animal welfare. The associated storage building will house a Farmyard Manure (FYM) store of 100' x 40', reduced from the previously consented 120' x 45', along with three silage clamps.

It is proposed that surface water generated from the proposed development will be managed on site via a number of attenuation & SuDS features such as 5 no. 30,000 litre rainwater harvesting tanks located at the base of Rainwater Pipes (RWP) and an attenuation basin.

The overflow from the proposed Rainwater Harvesting (RWH) tanks will be conveyed to the attenuation basin located to the north of the development, adjacent to the proposed buildings. This basin will provide temporary storage and attenuate runoff before discharging into the existing ditch network at a controlled rate of 1.5 L/s (Qbar). All SuDS components have been designed to accommodate a 1 in 100-year rainfall event, including 45% climate change allowance and 10% urban creep,

The applicant will need Land drainage consent from Wiltshire Council as the development is proposes to discharge flow into an ordinary watercourse

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.

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.
- 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.
- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.
An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

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.