

To:	Development Management	From:	Drainage Team (Aayushi Kochar)
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Planning App Ref:	PL/2026/00881
Service Ref:	Drainage
Date:	18/03/2026

PROPOSAL

Full planning permission for proposed detached dwelling

SITE LOCATION

1B Clarendon Road, Trowbridge, BA14 7BR

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	X
Support	
Comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- *Application form redacted*
- *Design and access statement*
- *Flood risk map*
- *Proposed elevations and location plan*
- *Proposed floor plans*
- *Proposed site plan and Proposed west elevation*

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 applicant intends to self-build a single detached dwelling on a development site where planning permission was previously granted for two separate two-storey houses (references PL/2021/10447 and PL/2021/10452).

The current proposal combines these two earlier consents into a single new dwelling. The overall footprint and total floor area of the proposed development are smaller than the combined footprints of the previously approved houses.

A portion of the site adjacent to Paxcroft Brook is located within Flood Zone 3. The proposed dwelling will connect to the existing domestic foul drainage system, which ultimately discharges into the public foul sewer. Surface water from the new building will be managed on-site and conveyed through the plot for controlled discharge into Paxcroft Brook.

Previous applications suggest that the applicant intended to discharge via soakaways. As the current proposal excludes the use of soakaways, the applicant should submit evidence (e.g. infiltration tests) confirming that infiltration is not viable. This is to demonstrate compliance with the drainage hierarchy and justify the chosen method of discharge.

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:

- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
- A clearly labelled drainage layout plan showing any proposed pipe networks, attenuation features, SuDS features, and outfalls to watercourse.
- Pre development runoff rates, and post development runoff rates in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- Evidence that surface water can be safely managed within the proposed development, up to and including a 1 in 100 year plus climate change event.
- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- Plan for safe access and egress in case of emergency is required.

INFORMATIVES

- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, **the discharge rate from the site must be agreed with Wiltshire Council** as part of agreeing the surface water drainage strategy for the site.

- The applicant should note that it is the LLFA's preference that SuDS be utilised wherever possible in accordance with the [National Standards for Sustainable Drainage Systems \(SuDS\) June 2025](#).

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.

National planning policy requires SuDS to provide multifunctional benefits, where possible. There are four main categories of benefits that can be achieved by SuDS: water quantity, water quality, amenity and biodiversity. These are referred to as the four pillars of SuDS design.

The comments from the Council's Drainage team address only water quantity and quality benefits. The Council's Landscape and Design team must be consulted to comment on amenity and biodiversity benefits, to ensure high quality SuDS that provide multifunctional benefits.