

To:	Selina (Nina) Parker-Miles	From:	Drainage Team (Abhishek Nandan)
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Planning App Ref:	PL/2026/00762
Service Ref:	Drainage
Date:	30/03/2026

PROPOSAL

Householder Planning Permission

Demolition of existing extensions, outbuildings and 20th Century garage structure. Construction of two storey extension to south-east of original cottage, rebuilding of historic cottage to address structural and fabric failings. Relocation of existing swimming pool. Extension to existing boundary wall to Upper South Wraxall following removal of structures and construction of new boundary wall to western boundary.

SITE LOCATION

57, Upper South Wraxall, Bradford On Avon, BA15 2SE

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 (*Feb 2026*)
- Design and Access Statement, Ecology Report, Arboricultural Report, Flooding and Drainage Statement (*Feb 2026*)
- Existing Site Plan (*Feb 2026*)
- Location Plan (*Feb 2026*)
- Proposed Site Plan (*Feb 2026*)
- Existing house elevation (*Mar 2026*)
- Existing demolition plans (*Mar 2026*)
- Structural Inspection (*Mar 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

We acknowledge that the applicant has provided additional documents; however, only the site plans and structural inspection report have been submitted. No technical drainage details have been provided. Therefore, our previous comments remain valid.

The applicant notes that the site is located within Flood Zone 1, indicating a low probability of fluvial flooding, and therefore a Flood Risk Assessment is not required at the planning stage.

Local evidence and Wiltshire Council's SFRA mapping show a 1 in 1000-year surface-water flood risk affecting the existing driveway and garage area, with occasional ponding reported during heavy rainfall when the adjacent road gully becomes blocked.

The proposed works address this by relocating the garage outside the mapped surface-water risk area, incorporating flood-resilient construction measures, and implementing a SuDS-based drainage strategy including a porous driveway, threshold drain, and new soakaway system to ensure that surface water is managed on-site without increasing runoff to the public highway.

We acknowledge the applicant has reconsulted with additional documents providing details on the existing house elevations, demolition plans, and structural inspection. As no significant new information has been submitted, the previous condition remains valid.

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 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:

- In accordance with the Sewerage Sector Guidance (paragraph C.3.12) and Standard 1 of the National Standards for SuDS, the applicant is required to consider how surface water for re-use can be maximized or provide justification as to why it cannot be achieved on this site.
- 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 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.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- The applicant shall submit a drainage layout for the site detailing proposed SuDS features, pipes, and manhole / inspection chambers.
- In accordance with Standard 3 of the National Standards for SuDS, overland exceedance routes are to be identified and shown on the drainage plan to demonstrate no adverse flood risk to the development or elsewhere.
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.
- 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.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- 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).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the Wiltshire Guidance.
- Swimming pools must not be drained into surface water drains/water courses/waterbodies. Discharge to foul drainage networks may require additional consent from the Sewerage Undertaker.

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 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.