

To:	Audrey Lo	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/01280
Service Ref:	Drainage
Date:	01/04/2026

PROPOSAL

Householder planning permission

Proposed Demolition of existing small extension and construction of full width Single-Storey extension with 15 degree Lean to roof to provide additional living space and ground floor WC facilities, and the addition of a small dormer window/roof to the first floor and associated works.

SITE LOCATION

Tanners Bridge Cottage, Tanners Bridge, Garsdon, Malmesbury, SN16 9NT

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
- Location Plan
- Flood Risk Form
- Appendix-C - Wiltshire SFRA Map
- Appendix EA Flood Risk

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 proposal involves removing a small existing extension and constructing a new full-width single-storey extension, together with a small first-floor dormer window/roof.

The applicant has not provided a drainage strategy at this stage. The increase in impermeable area has also not been defined creating uncertainty about potential changes in runoff.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 3 and has a high level of risk from fluvial and surface water flooding. A part of the site has a high level of risk from ground water flooding.

A site-specific Flood Risk Assessment (FRA) is required for this application due to the works within Flood Zone 3. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, and how the flood risk from **all sources** will be managed without increasing flood risk to the development itself or elsewhere. It should also outline the proposed drainage strategy for the site. The applicant is referred to the Environment Agency's [advice](#) on how to prepare an FRA, as well as their standing [advice](#) for vulnerable developments. Of particular note, we will need to see that the proposed works will not result in loss of fluvial flood plain so as there will not be an increase in flood risk elsewhere.

The applicant shall review all published Section 19 reports on historic flooding within Wiltshire and incorporate these into their holistic assessment of flood risk, and historic flood events. These reports can be found on the council website here [Flooding - Wiltshire Council](#)

The applicant has proposed several flood mitigation measures such as

- floor levels within the proposed development to be set no lower than existing levels
- flood boards and flood doors to prevent water ingress to building
- electrical sockets to be raised a min 400mm above floor level
- flood resilient finishes/materials
- self-closing air bricks/non-return valves on drainage to be fitted

These are all positive measures and in-line with expectations.

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 detailed review of the drainage and flood risk aspects of the proposal. In particular, a site-specific Flood Risk Assessment (FRA) must be submitted, demonstrating that the development will not increase flood risk on-site or elsewhere and that appropriate mitigation and drainage measures have been fully considered in accordance with national and local planning policy.

- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- The applicant should submit both an existing drainage strategy drawing showing how surface water is currently managed on the site and a proposed drainage strategy drawing, demonstrating how surface water will be managed safely in the future without increasing flood risk elsewhere.
- If infiltration is proposed, the design shall be informed by infiltration tests undertaken in accordance with BRE 365, together with the results of seasonal groundwater monitoring.

or

If discharge to a watercourse or sewer is proposed, the applicant must submit pre- and post-development discharge rates in accordance with Wiltshire Council's [betterment policy](#) for greenfield sites.

or

If discharge to a drainage system not owned by the applicant is proposed, consent for any outfalls from the proposed drainage systems to this drainage system (public sewer or other).

- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Details of how the proposed drainage features on the site will be maintained and managed after completion.

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 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.

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.