

To:	Andrew Thomas	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/00028
Service Ref:	Drainage
Date:	13/04/2026

PROPOSAL

Full application

Part demolition of existing buildings and erection of two self-build dwellings (use class C3) including parking, landscaping and associated works.

SITE LOCATION

Land adjacent 36, Bath Road, Bradford on Avon, BA15 1SR

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 (Jan 2026)
- Design and Access Statement (Jan 2026)
- Drainage Strategy (Jan 2026)
- Existing Site Plan (Mar 2026)
- Geo-Environmental Report (Jan 2026)
- Location Plan (Mar 2026)
- Proposed Site Plan (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

The application seeks full planning permission for the demolition of existing commercial garages and outbuildings on the site to enable the erection of two new residential properties.

According to SFRA, the proposed site is within Flood Zone 1 and has a low risk of surface water and groundwater flooding.

The applicant proposes to manage surface water runoff from the new buildings and external hardstanding areas through a sustainable drainage system that disposes of runoff at source via infiltration. This approach is intended to minimise the exceedance flows that currently discharge onto the public highway under the existing site arrangement.

Roof runoff is proposed to be attenuated and infiltrated through two cellular soakaway units positioned within the plot gardens. Additional infiltration is expected to be provided by the use of porous driveway construction. The applicant has provided the results of BRE365 soakaway testing, where no groundwater was encountered up to 1.8m bgl, and has provided soakaway calculations that demonstrate adherence to Soakaway Guidance.

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 maximised or provide justification as to why it cannot be achieved on this site.
- The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with Standard 4 of the National Standards for SuDS.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- The applicant shall submit a manhole / inspection chamber schedule to include cover and invert levels.

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).

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.