

To:	Rose Fox	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01698
Service Ref:	Drainage
Date:	28/04/2026

PROPOSAL

Change of use of agricultural land used as a paddock to domestic and to build a detached bungalow with garage, drive and gardens.

SITE LOCATION

Summerleaze Lodge, 10 Beanacre, Melksham, SN12 7PT

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 Assessment
- Existing Block Plan
- Proposed Block Plan
- Proposed Floor Plan
- Proposed Elevations

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 has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

As per the FRA the site is in Flood Zone 1. However, no details for surface water flooding and groundwater flooding have been provided. Viewing the SFRA, the site has low risk of surface water flooding and medium risk of groundwater flooding.

The applicant is seeking permission for change of use of agricultural land currently used as a paddock to residential use, including the construction of a 2-bedroom bungalow with an associated garage, driveway, and garden areas. As a result of the proposed change of use, the extent of impermeable surfacing across the site will increase.

To help mitigate this the main access drive and parking area will be constructed using permeable gravel to allow infiltration at the vehicle entrance. The patio areas and pedestrian paths will also be formed using permeable surfacing.

In addition, rainwater harvesting measures, including roof water collection and water butts, will be incorporated to reduce surface water runoff and promote sustainable water management.

However, no details have been provided regarding the drainage strategy.

It's noted the applicant will raise the FFL by 300mm above the ground level, as stated in the FRA.

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:

1. The site is located in an area susceptible to groundwater flooding. Therefore, in line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant is required to carry out a site-specific groundwater flood risk assessment that includes all available information and data from local sources such as historical records, parish councils, flood action groups and borehole records. In areas susceptible to groundwater flooding infiltration SuDS is not permitted unless it can be demonstrated to be appropriate. The groundwater assessment must include/consider the following:
 - Groundwater level monitoring (taking into account seasonal variations).
 - The interaction between different sources of flooding.
 - How groundwater will impact on the proposed drainage system.
 - The interaction between groundwater, groundwater recharge and aquifers.

The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG 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:

A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and National Technical Standards for SuDS.

- The applicant must provide a detailed drawing outline the existing drainage features onsite, and a drawing displaying the proposed drainage features onsite.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- Calculations that demonstrate the sizing of any attenuation/ SuDS features
- The surface water drainage strategy should demonstrate that:
 - The 1 in 30-year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100-years plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
 - The site has been designed to ensure that flows in excess of the 1 in 100-year rainfall event are managed in exceedance routes that minimise the risks to people and property.

- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion.

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).
- 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.