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| <b>To:</b> | Steven Sims | <b>From:</b> | Aayushi Kochar |
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|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2026/00531 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 14/05/2026    |

## PROPOSAL

Outline application for development of 9no self-build dwellings. All matters reserved except for Access and Layout.

## SITE LOCATION

Land to the East of Yarnbrook Road, West Ashton, Trowbridge, BA14 6AP

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required | <b>X</b> |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              |          |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- Application Form
- Design and Access Statement
- Letter - agents response to consultees
- PL 2026 00531 SW Drainage Response (Issued on 02<sup>nd</sup> February 2026)
- Preliminary Ecological Appraisal
- Site Context Plan
- Site Layout - Location Plan

## 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 is outline application for development of 9 no. self-build dwellings. The total site area for the proposed development is 0.47 Hectares.

The applicant has submitted a response following the objection and conditions previously raised. They state that, as no dwellings have yet been designed, it is not possible at this stage to provide BRE 365 soakage test results, drainage layout plans, attenuation sizing, exceedance routing, or Finished Floor Level (FFL) evidence.

However, in the previous response, the Lead Local Flood Authority (LLFA) raised an objection specifically requiring BRE 365 soakage testing to assess the feasibility of infiltration and to establish groundwater levels on site. These tests do not depend on the detailed design of the dwellings and can be undertaken independently at the current stage. Therefore, the applicant must submit the results of the soakage testing in order to address and remove the existing objection. The LLFA acknowledges that other detailed drainage information can be secured by condition and provided at a later stage, such as the pre-commencement or reserved matters stage, once the dwelling designs have been finalised.

## 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 demonstrate the proposed means of surface water disposal are feasible, and adhere to the surface water disposal hierarchy.**

- 1. The following information is required to demonstrate that infiltration is a feasible means of surface water disposal ([Standard 3: management of extreme rainfall and flooding](#) para 3.14-3.17):**
  - 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 100yr + cc flows (for multiple properties)
    - 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.
  - 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.

This is required as IS Soilscales ([LandIS - Land Information System - Soilscales soil types viewer](#)) suggests the soil at the site may have impeded drainage.

**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, Non Statutory Technical Standards for SuDS 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:

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- 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.

- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a 150 mm height above the SW drainage cover levels.
- Evidence that the proposed drainage design provides a sufficient level of water treatment.

## 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.
- Consent will be required for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- 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.