

To:	Jane Sanger	From:	Rahul Dixit
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Planning App Ref:	PL/2026/02430
Service Ref:	Drainage
Date:	03/06/2026

PROPOSAL

Resubmission of application for construction of garage/workshop previously approved under PL/2022/00548 and PL/2023/01359

SITE LOCATION

13b London Road, Marlborough, SN8 1PH

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	X
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application form
- Flood risk assessment
- Location and site plans
- Proposed elevations and floor 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.

Relevant Planning History:

PL/2023/01359 – Approved – Alteration to planning permission 15/02364/FUL to include additional porch to approved dwelling

PL/2022/00548 – Approved – Construction of garage/workshop.

15/02364/FUL – Approved - Erection of a detached dwelling with amendments to internal layout, elevation, and footprint of previously approved application 14/06254/FUL.

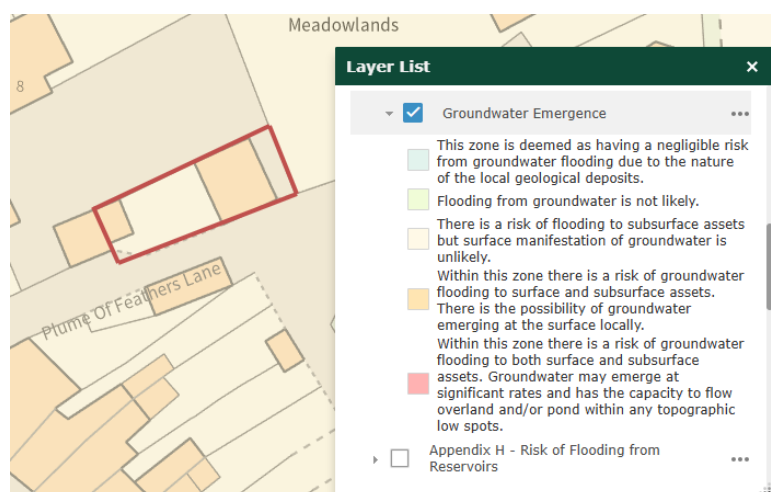
14/06254/FUL – Approved – Construction of a two-bedroom cottage.

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.

The FRA identifies the site as being located within Flood Zone 2, indicating a medium risk of fluvial. No details regarding surface water flooding and groundwater flooding are provided in the FRA

However, as per Wiltshire Council SFRA there is low risk of surface water flooding but the access to the site is at high risk of flooding. Also, mapping suggests a high level of risk from ground water flooding with groundwater levels ranging from approximately 0.025 m to 0.5 m below ground level.



The applicant is seeking permission to construct garage or workshop next to the existing house. Which was previously approved under PL/2022/00548 and PL/2023/01359. There is no information provided specifying the change in impermeable area, however on the basis of previous applications the area is approximately 125 Sq. M.

It is noted that the applicant has proposed following flood mitigation measures:

- The floor level of the garage will be a minimum of 50mm above general ground level and will slope towards the external doors by 50mm.
- The external walls will be of resilient masonry construction. There will be no cavity as the building is to be an unheated garage. The outer face will be treated with a breathable but water resisting silicone coating to inhibit water penetration plaster.
- New floors will be of solid construction with a concrete slab over a sealed damp proof membrane turned up and linked to damp proof courses in the walls.
- All electrical services will be kept to a minimum height of 450 mm above the floor level.
- All paving will be permeable type.

RECOMMENDATION

No Objection for the following reasons:

The proposed works are minor in nature and will not result in a significant increase in impermeable area or corresponding flood risk when compared to the existing baseline scenario. As such, we have no objections to this application.

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 sets 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.