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Planning App Ref:	PL/2026/02837
Service Ref:	Drainage
Date:	08/06/2026

PROPOSAL

Full application proposed 2 new dwellings (1 x Self Build) with landscaping

SITE LOCATION

3 Little Common, North Bradley, Trowbridge, BA14 0TX

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
- Design and Access Statement
- Location Plan and Proposed Block Plan
- Proposed Floor Plans and Elevations – Plot 1 & Plot 2

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

As per the SFRA the site is flood zone 1 and is at low risk of fluvial flooding. Flood risk to the proposed site from groundwater is also low.

The Application seeks permission for the erection of two detached new 4-bedroom dwellings along with the associated Parking and landscape requirements with site area of 0.16 Ha.

The proposed block plan indicates the use of soakaways for the self-dwelling, and the application form states that sustainable drainage is proposed. However, no detailed drainage strategy has been submitted in support of the application.

We note there is a legal right of way across the property in Plot 1. The applicant must provide details of this legal right of way and the associated land use.

RECOMMENDATION

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, 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:

- Noting the applicant proposed to discharge surface & foul flows via infiltration, the applicant must provide evidence that soakage tests have been undertaken in accordance with BRE 365 methodologies. This is required 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
 - Half drain time <24hrs
 - Applied a factor of safety of 10 in line with CIRIA C753 (Table 25.2) – site area 1562m² & site solely reliant on infiltration as means of disposal.
 - Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and there is at least 1m clearance from the soakaway base.
 - Minimum 5m clearance between the soakaway and any built structure or highway.
- Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- The applicant must provide details of the soakaway overflow discharge to ditch. Notably, how this will be safely managed, how this is activated, and the anticipated discharge rate.
- The applicant must provide a clearly labelled drainage layout plan displaying the proposed and existing pipe networks and drainage features.
- 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.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.

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.
- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- The application states that foul drainage will discharge to a private treatment system. This requires consultation with the EA, see the [EA guidance](#). The applicant can also contact the EA for pre-planning advice at swx.sp@environment-agency.gov.uk.
- 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.