

To:	David Millinship	From:	Drainage Team
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Planning App Ref:	PL/2026/00442
Service Ref:	Drainage
Date:	23/06/2026

PROPOSAL

Technical Details Consent for the erection of 2no. dwellings with associated access, parking, turning, landscaping and private amenity space – and removal of existing barns (following the approval of PL/2025/06697)

SITE LOCATION

Land at Newlands Farm, Rodbourne Road, Corston, Malmesbury, SN16 0HB

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 Redacted (*Jan 2026*)
- Covering Letter (*Jan 2026*)
- Existing Site Plan and Location Plan (*Jan 2026*)
- Planning Design and Access Statement (*Jan 2026*)
- Proposed Site Plan (*Jan 2026*)
- 1250-01 Drainage Strategy Report (with appendices) (*July 2026*)
- DC1250-01-01 Drainage Layout (*July 2026*)
- DC1250-02-01 Drainage Construction Details (*July 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 has not 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 document submitted, and we do not take any responsibility for incorrect data or interpretation made by the authors.

We acknowledge that the applicant has submitted additional information. The previous proposal to manage surface water via infiltration has been revised following evidence confirming that infiltration is not feasible due to clay soils and failed soakage tests. Surface water will now be managed through a sustainable drainage system (SuDS), incorporating permeable paving and an underground cellular attenuation tank. Runoff is proposed to be discharged at a restricted greenfield rate of 2.7 l/s via a hydrobrake to a nearby ditch network, without any demonstrated betterment.

Wiltshire Council guidance requires that, where infiltration is not feasible, discharge rates should provide a minimum 30% betterment over greenfield runoff conditions, which has not been achieved in this proposal.

The system has been designed to accommodate the 1 in 100-year storm event plus 45% climate change, with exceedance flows directed along natural site gradients toward adjacent fields. All drainage infrastructure will remain privately owned and maintained.

RECOMMENDATION

Holding objection as further information required

At this stage, the LLFA cannot support the application due to the absence of demonstrated compliance with the 30% betterment requirement and the lack of confirmation regarding ditch capacity and downstream impact.

- The applicant is required to demonstrate that a minimum 30% betterment below the greenfield runoff rate can be achieved, noting that the current proposal discharges at 2.7 l/s (QBAR), which is the same as the existing greenfield rate for the 1 in 2.33yr event. Where this is not feasible, robust justification must be provided explaining why a reduced discharge rate cannot be achieved.
- The applicant should provide evidence to demonstrate that the receiving ditch has sufficient capacity to accommodate the proposed discharge rate without increasing the flood risk elsewhere, supported by an appropriate hydraulic assessment. This could be demonstrated through provision of catchment plans to demonstrate that there is no increase in catchment area draining (and therefore if the above point is met that there would not be an increase in discharge rate).
- The applicant must submit clear arrangements for the frequency of ongoing maintenance activities of the proposed drainage system (including SuDS features) over the lifetime of the development (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

INFORMATIVES

- All new drainage will need to comply fully with Building Regulations Part H.
- The applicant must ensure a copy of the agreed drainage strategy and associated maintenance regime is included in the title deeds of the property.
- The proposed foul connection and discharge rate must be discussed and formally agreed with the relevant sewerage undertaker.
- 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.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#)

- 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.