

To:	Selina (Nina) Parker-Miles	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/02354
Service Ref:	Drainage
Date:	28/07/2026

PROPOSAL

Full planning permission

Change of use of agricultural land to a sports and recreational facility, comprising two outdoor padel courts and associated ancillary development.

SITE LOCATION

Fairfields, Semington, Trowbridge, BA14 6JD

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
- Drainage Plan
- DRAINAGE STRATEGY STATEMENT FAIRFIELDS
- Existing Site Plan
- Location Plan
- Proposed Site Plan
- RDPC-008

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 proposed surface water drainage strategy adopts an infiltration-led approach whereby rainfall from the padel courts, permeable gravel parking area, and ancillary development is allowed to infiltrate naturally into the ground, thereby maintaining the site's existing drainage regime and minimising runoff. The padel courts will be constructed using a permeable iFrame system that allows water to pass through the surface and sub-base layers, while runoff from the welfare cabin roof will be collected in a rainwater butt for reuse, with any overflow directed to adjacent grassed areas.

Based on the Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#) the site has a high risk of groundwater flooding affecting both surface and subsurface assets as shown in Figure 1.

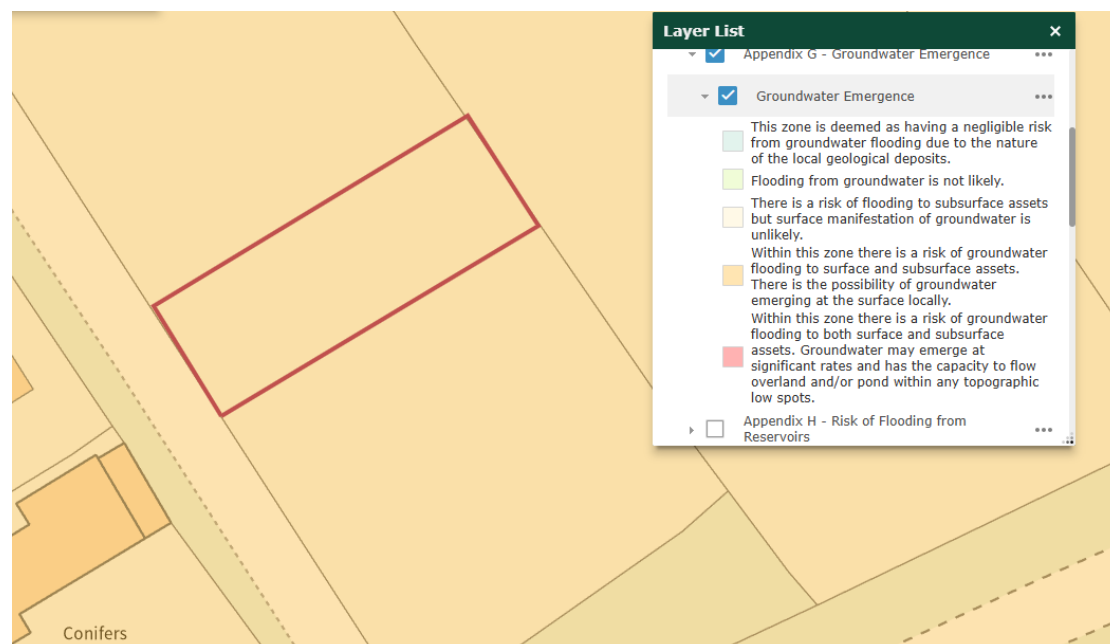


Figure 1: Groundwater flood risk

Although the drainage strategy adopts SuDS principles and relies on infiltration to manage surface water runoff, the identified high risk of groundwater flooding presents a potential constraint. Therefore, the suitability of the proposed approach should be supported by detailed BRE365 infiltration testing and groundwater monitoring, to demonstrate that the proposed infiltration measures can operate effectively without increasing flood risk or adversely affecting surface and subsurface assets. If there has been previous infiltration testing & groundwater monitoring at the farm, the applicant could provide these documents to the LLFA for review.

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 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:

- 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.
- Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and how it will impact on the proposed drainage system.
- Evidence that soakage tests have been undertaken in accordance with BRE 365 to demonstrate that infiltration is feasible.
- The applicant should confirm whether any level changes are proposed as part of the development and provide an assessment of the impact on flood risk and on overland flow routes during extreme events and/or in cases of potential SuDS blockages and failure.
- 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).
- 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.
In addition, the applicant is required to demonstrate that the proposed discharge from the package treatment plant is in full compliance with the General Binding Rules (for discharge to a drainage field) or that an Environmental Permit from the EA has been obtained.

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.