

To:	Adrian Smith	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/00782
Service Ref:	Drainage
Date:	04/09/2026

PROPOSAL

Full application

The erection of 8 dwellings and associated infrastructure.

SITE LOCATION

Land at Sling Road, Bulford, Wiltshire, SP4 9AP

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

- Design and Access Statement (*Feb 2026*)
- Existing Block Plan (*Feb 2026*)
- Flood Risk Assessment and Drainage Strategy (*Feb 2026*)
- Location Plan (*Feb 2026*)
- Planning Statement (*Feb 2026*)
- Proposed Block Plan (*Feb 2026*)
- Additional Docs Cover Letter (*Aug 2026*)
- Gradiometer and Ground Penetrating Radar Survey Report (*May 2026*)
- Letter from Agent (*Jul 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 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 applicant states that the site lies entirely within Flood Zone 1 and is therefore at low risk from all sources of flooding, requiring only precautionary measures such as setting finished floor levels 150 mm above ground level.

The applicant intends to manage stormwater through a Sustainable Drainage System incorporating permeable paving and an infiltration basin (with a geocellular tank base), designed to accommodate storms up to the 1 in 100-year event with a 40% climate change allowance. In addition, the applicant confirms that the proposals incorporate a rainwater reuse strategy (property level water butts), for use in non-portable household functions.

Since infiltration testing in accordance with BRE Digest 365 has not been carried out on site, applicant notes a conservative figure of 5mm/hr has been considered.

The applicant has confirmed that the preferred surface water drainage strategy is disposal via soakaways and has identified a fallback option comprising on-site attenuation with discharge to the existing Bulford Barracks surface water drainage system should infiltration prove unsuitable. The LLFA acknowledges that this provides a potential alternative means of surface water disposal in accordance with the drainage hierarchy.

The applicant has not submitted any hydraulic modelling results for the proposed drainage features. Although the applicant indicates that exceedance flows will be directed away from buildings, no exceedance routing plan has been submitted to support this.

Additional information on BRE 365 infiltration testing, groundwater monitoring data, and evidence of interception storage and discharge rights for the proposed receiving drainage network need to be submitted to support the proposed drainage solutions.

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:

- a) The surface water drainage strategy should demonstrate with the help of modelling results that:
 - The 1 in 30 year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement).
 - The site has been designed to ensure that flows in excess of the 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.
- b) The drainage drawings should show the pipe / link & manhole / node numbers used in the calculations in order to link the drawing with the detailed calculations.
- c) The applicant shall submit a manhole / inspection chamber schedule to include cover and invert levels.
- d) Pre and post development exceedance routing plan that demonstrates flood risk is not increased elsewhere.
- e) Hydraulic modelling results that demonstrate adequate sizing of attenuation/ SuDS features and cross section drawings of these features.
- f) If infiltration is proposed,
 - 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)
 - 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/permeable paving.

If discharge to sewer system is proposed,

- Consent for any outfalls from the proposed drainage systems into a drainage system not owned by the applicant.
- Evidence shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS.

Calculations that demonstrate compliance with these interception requirements should be provided.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the [Wiltshire Guidance](#).

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.