

Wiltshire Council Planning Consultation Response

27 October 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Andrew Thomas
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Application No: PL/2025/06615
Full Planning Permission
Erection of building comprising 4No. flexible B8 storage and distribution and/or Class E(g) Commercial, Business and Service units and erection of building for mixed agricultural and equestrian workshop, storage and estate office and stables, all following demolition of existing B8 storage building and site remediation, together with associated parking, servicing, drainage, infrastructure, biodiversity net gain and landscaping and alterations to existing vehicular access
Building at Seagry House, Off Henn Lane and Startley Road, Upper Seagry, Chippenham, SN15 5HD

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

☐	No Comment
☐	Support
☐	Support subject to conditions (please set out below)
☒	Holding Object (for reasons set out below)
☐	No objections

Matters Considered:

Documents Reviewed:

- Application Form (Aug 2025)
- Design and Access Statement (Aug 2025)
- Access Layout (Aug 2025)
- Flood Risk Assessment and Drainage Strategy (Aug 2025)
- Location Plan (Aug 2025)
- Cover Letter (Aug 2025)
- Phase 1 and 2 Desk Study and Ground Investigation Report (Aug 2025)
- Planning Statement (Aug 2025)
- Topographic Survey (Aug 2025)
- Existing Site plans (Aug 2025)
- Proposed Block A – Elevations and Plans (Aug 2025)
- Proposed Hard Landscaping (Aug 2025)
- Proposed Block B – Elevation and Plans (Oct 2025)
- Whole Site Plan – Proposed (Oct 2025)
- Site Sections (Oct 2025)
- Prelim Access Layout (Oct 2025)
- Site Plan - Proposed (Oct 2025)

We have reviewed the additional information submitted by the applicant. While revised plans, elevations, and section details have been provided, no drainage details or supporting evidence addressing our previously stated conditions have been included. Therefore, our earlier comments remain valid.

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 report confirms that the site is located within Flood Zone 1, indicating a low risk of fluvial or tidal flooding. It also concludes that groundwater flood risk is negligible.

As per SFRA, one of the proposed access routes to Startley Road lies within an area of surface water flood risk. However, a second access route via Henn Lane, outside the surface water flood extents, is proposed to function as an emergency access route. This ensures that safe access and egress can be maintained during flood events.

However, given that one of the access routes is susceptible to flooding, the applicant should prepare and provide an emergency evacuation plan, even if an alternative access exists. This plan should be agreed upon with Wiltshire Council to ensure clarity and preparedness in case of an emergency.

Infiltration has been deemed unsuitable based on the results of BRE365 testing.

Western catchment: Runoff from buildings and yards attenuated in permeable paving, a detention basin (1.5m deep, 0.3m freeboard) and cellular storage. Flow restricted to 1.40 l/s (matching the 1 in 2-year brownfield rate) before discharge to an existing private surface water sewer via an existing connection. It is understood that this private sewer discharges to ponds to the west and then to the watercourse to the south-west of the site.

Eastern catchment: Road runoff collected in filter drain/stone sub-base, restricted to 0.90 l/s, discharged to roadside ditch/culvert leading to the River Avon (Bristol).

However, the submitted Flow+ modelling results reveal flooding at the Startley Road causeway/culvert nodes during the 1 in 100-year plus 45% climate change event. In addition, the drainage calculations for Network 2 (eastern catchment) show flooding during the 1 in 30-year event, which is not acceptable.

On this basis, the LLFA cannot confirm that the proposed strategy complies with the National Standards for SuDS (2025).

Holding Objection

The LLFA places a holding objection on this application until the following additional information has been submitted demonstrating that the drainage strategy is fully compliant with the National Standards for SuDS (2025)

- The applicant is required to confirm whether a Rainwater Harvesting (RWH) system will be included in the proposed design, and to provide further details regarding its planned implementation.
- A demonstration of the inclusion and arrangement of interception storage features in accordance with Standard 2 of the National Standards for SuDS. Evidence and calculations shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, or else captured, conveyed and stored within SuDS features.
- The applicant must provide a catchment plan based on the topographical survey, clearly identifying which areas of the site drain to the east and west. This plan should demonstrate no catchment transfer as a result of the development, support the calculation of existing runoff rates, and inform the allowable discharge rate at each outfall.
- The submitted exceedance flow routing does not match the levels shown on the topographic survey in all locations. The applicant should confirm whether any re-levelling is planned to facilitate exceedance routing, and submit any supporting plans where required.
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

- One of the accesses to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#)

Informatives:

- 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](#).

- All new drainage will need to comply fully with Building Regulations Part H.

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Rahul Dixit (AtkinsRéalis) working on behalf of Wiltshire Council Drainage.