

To: Development Management

From: Drainage Team [Rahul Dixit]

Planning App Ref: PL/2025/07726

Service Ref:

Date: 07/11/2025

PROPOSAL

Full planning permission for Electric vehicle charging facility

SITE LOCATION

Land North of Bath Road, Chippenham, SN14 0BJ

The site is located within Flood Zone 1 and is considered to have a low risk of surface water flooding. However, the Strategic Flood Risk Assessment (SFRA) indicates that there is a risk of groundwater flooding to surface and subsurface assets.

Based on DEFRA Magic Maps the site is shown to be in SPZ 2 – Outer protection zone

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
- Drainage Strategy
- Planning, Design and Access Statement
- Location and Block Plan
- Location Plan
- Proposed Site Layout
- Utility and Topographical Survey

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 20% 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

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 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.

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 development comprises a standalone public electric vehicle (EV) rapid charging hub, incorporating 16 rapid charging units. The scheme will result in a net increase in impermeable surface area, thereby increasing surface water runoff from the site. To mitigate this, the applicant proposes a drainage strategy whereby runoff will be collected and conveyed to an attenuation tank, discharging it at a controlled rate of 2 l/s via a flow control manhole into the existing public surface water sewer.

We would also expect the applicant to restrict the discharge rate to 1l/s, in line with the Lead Local Flood Authority's (LLFA) experience that this flow rate is still practicably achievable with appropriate design and ongoing maintenance.

Additionally, the proposal includes Battery Energy Storage System (BESS) units on site. The applicant is advised to consult with the Local Fire and Rescue Service (FRS) to ensure a site-specific fire risk assessment and water supply provisions for firefighting are agreed upon, in accordance with National Fire Chiefs Council (NFCC) guidance. Drainage and treatment measures must be implemented to ensure that any potentially contaminated effluent resulting from a pollution incident does not pose an unacceptable risk to the water environment.

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:

- The site is located in an area susceptible to groundwater flooding. Therefore, in line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant is required to carry out a site-specific groundwater flood risk assessment.
- National Standard 2 requires applicants to provide interception of the first 5mm of rainfall on a development. The applicant should demonstrate how this is achieved on their site through either additional calculations or quantification via the rules outlined in [National Standard 2](#).
- A plan showing pre & post-development overland flow routes to ensure flood risk is not increased to people or property.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Hydraulic calculations in conjunction with drainage layout plan, that demonstrate that there is no flooding on-site during a 1 in 30-year rainfall event and no flooding affecting any people or property during a 1 in 100-year plus climate change rainfall event.
- A detailed plan showing the cross-section details of all proposed SuDS features on the site (includes the cover levels, invert level, groundwater level, etc.)
- Evidence of flotation calculations, or evidence of attenuation tank lining, as the SFRA show that site is subjected to high risk of ground water flooding with groundwater levels are between 0.025m and 0.5m below the ground surface.
- The final drainage design must demonstrate that, in the event of a battery fire, all firefighting runoff and effluent can be safely contained on site, with no unacceptable risk of pollution to the surrounding water environment.

Informative

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

- Any new connection to sewers will be subject to S 106 agreement under the Water Industry Act, with the Sewerage Undertaker