

To:	Development Management	From:	Drainage Team (Aayushi Kochar)
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Planning App Ref:	PL/2023/09142
Service Ref:	Drainage
Date:	09/12/2025

PROPOSAL

Outline application (with Access to be determined) for development of a new Motorway Rest Area (MRA) to provide up to 241 car parking spaces; up to 63 Heavy Goods Vehicle (HGV) parking spaces; coach and caravan parking; amenity building; fuel filling station; new roundabout access from B4005; and associated landscaping, infrastructure and ancillary works.

SITE LOCATION

Land at Junction 16 (M4), Swindon

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

- *Environment Statement - Non Technical Summary*
- *Environmental Statement - Volume 1*
- *Environmental Statement - Volume 2 Part 4*
- *Illustrative Masterplan*
- *Location Plan - Survey – Ponds*
- *OUT PL 2023 09142_ Drainage Response_v1.0 (Issued on 30th November 2023)*
- *OUT PL 2023 09142_ Drainage Response_v2.0 (Issued on 18th October 2024)*
- *Proposed Layout Plan (Illustrative)*
- *Proposed Site Access Plan*

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

Following our review of the amended plans and additional information submitted by the applicant in response to our previous drainage comments dated 18th October 2024, we note the following:

- The applicant has provided confirmation from Thames Water, including supporting documents, approving the discharge of foul water. A discharge rate of 2.94 l/s to a 225 mm foul water sewer via an existing manhole has been agreed.
- Drainage plans attached in the document have been updated to new layout.

However, the information provided does not address the outstanding comments raised in our previous response. As a result, the previously stated conditions remain applicable to this development until the applicant submits the required additional details.

RECOMMENDATION

No objection subject to the following conditions:

The drainage team in their capacity as Lead Local Flood Authority (LLFA) have the following conditions to the application, which need to be addressed by the applicant:

1. It is mentioned that the site is being underlain by a bedrock geology of Kimmeridge Clay Formation – Mudstone and therefore there is limited potential for infiltration for this development. In order to confirm, we would expect to see soakaway tests in accordance with BRE365 / demonstration that groundwater is shallow and would be within 1m of the invert of potential soakaway features. This is needed to demonstrate the applicant has fully considered the surface water discharge hierarchy.
2. The site sits wholly within Flood Zone 1; however southern and eastern parts of the site coincide with an open ditch and topographical low points are subject to surface water flood risk. Hence, applicant must demonstrate that:
 - These areas can be drained by the drainage network in the 1 in 30 year rainfall event with no flooding on the site.
 - Applicant has provided exceedance route plan for this development. However, the applicant should ensure other mitigation measures are in place including evidence that finished floor levels are at minimum 150 mm above in the 1 in 100 year + climate change flood level.

The calculations should set the MADD factor / additional storage value to 0m³/ha to prevent an over-estimation of attenuation storage available on site.

Due to outfall to an ordinary watercourse, the calculations should also be simulated with a surcharged outfall, to ensure that this does not cause flooding on site.

The drainage drawings should show the pipe/link & manhole/ node numbers used in the calculations in order to link the drawings with the detailed calculations.

3. The applicant states that discharge rates from the site will be equal to the Qbar greenfield rate. However, Section 7.35 states that discharge rates shall be limited to the Qbar event (1 in 2.33yr return period) for all storms up to and including the 1 in 100yr + climate change event. Although this will comply with the betterment policy for the majority of storm events, the applicant must demonstrate that for the 1 in 1 year event, discharge rates are restricted to 70% of 1 in 1-year greenfield rates. No development shall commence on site until the applicant has provided calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100-year return period storm events.

REASON: Wiltshire Council requires post development discharges to provide 20% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100-year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards.

4. No development shall take place before a detailed drainage strategy has been supplied. This drainage strategy should include evidence that the proposed development will not have adverse effects on the existing highways' drainage as mentioned in the National Highway's Comment dated on 28/11/2023.

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](#)

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.