

To: Development Management

From: Drainage Team (AtkinsRéalis)

Planning App Ref: PL/2025/08778

Service Ref:

Date: 21/11/2025

PROPOSAL

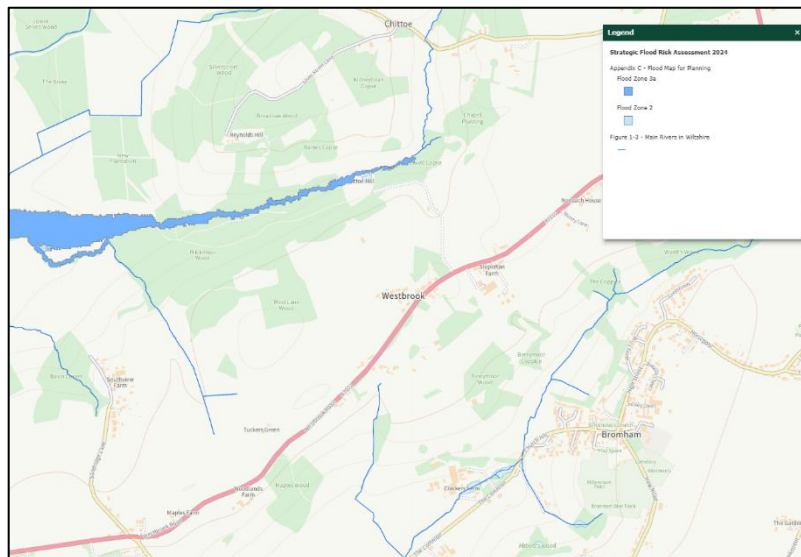
Request for an EIA Scoping Opinion, in accordance with Regulation 15 of The Town and Country Planning (EIA) Regulations 2017 (as amended) Housing.

SITE LOCATION

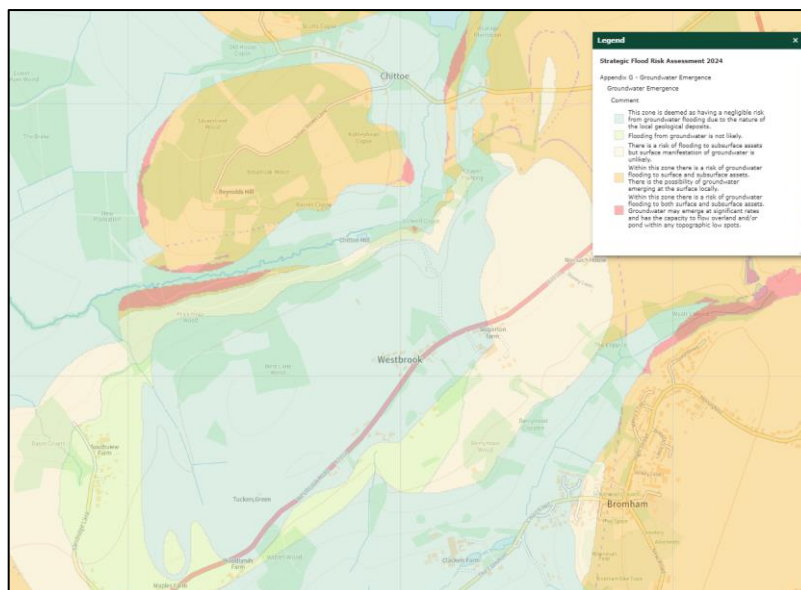
Land East of Blackmore Farm, Melksham.

The site is located adjacent to 1x unnamed inland river.

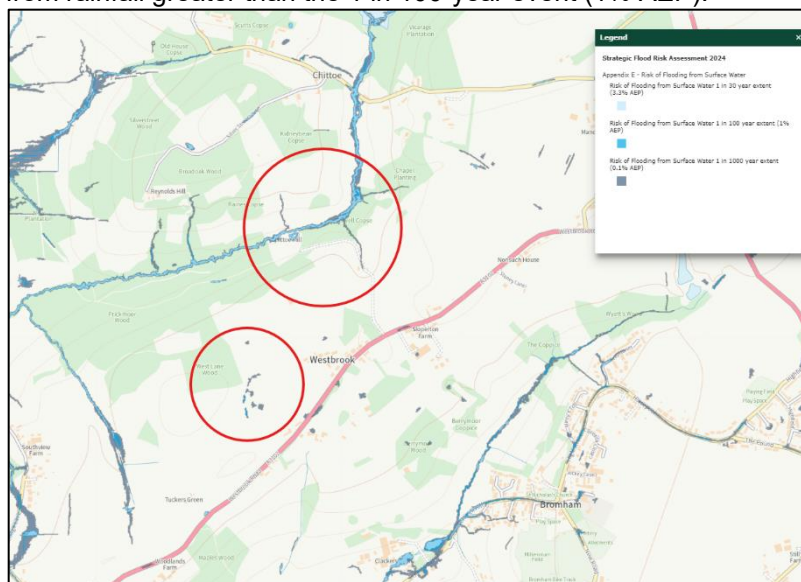
The Wiltshire Council Strategic Flood Risk Assessment, SFRA Data Explorer, has indicated that the site is located within Flood Zone 1.



The site does have a risk of groundwater flooding to surface and subsurface assets with localised groundwater emergence, which will need to be managed as part of the drainage strategy for the development.



According to the SFRA Explorer, the small areas of the site are also indicated to be at flood risk from rainfall greater than the 1 in 100-year event (1% AEP).



A site-specific Flood Risk Assessment (FRA) is required for this application. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, and how the flood risk from all sources will be managed without increasing flood risk to the development itself or elsewhere. It should also outline the proposed drainage strategy for the site. The applicant is referred to the Environment Agency's advice on how to prepare an FRA, as well as their standing advice for vulnerable developments.

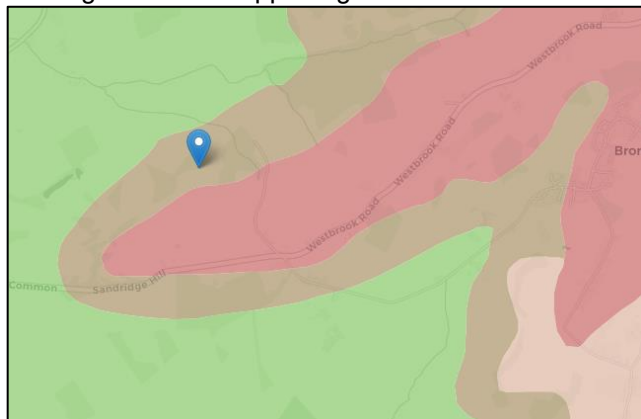
The applicant shall review all published Section 19 reports on historic flooding within Wiltshire and incorporate these into their holistic assessment of flood risk, and historic flood events. These reports can be found on the council website here [Flooding - Wiltshire Council](#)).

APPLICATION DOCUMENTS REVIEWED

- EIA Scoping Report.
- Appendix 5.2 BRD4599-OR1-A-Melksham DS_Parts 3-7 of 7.

DRAINAGE STRATEGY / DRAINAGE DESIGN

Based on BGS/Cranfield University Soilscape mapping, the site is indicated to be underlain by freely draining slightly acidic sandy soils (**red** – soilscape 10) and slightly acid loamy and clayey soils with impeded drainage (**brown** – soilscape 8). The suitability of infiltration to dispose of surface water will need to be assessed by the applicant using appropriate Ground Investigations and supporting detailed desk studies.



Based on DEFRA Magic Maps the site has been shown not to be in Source Protection Region. Additionally, the site is shown to be a medium priority zone for issues regarding surface water nitrate, sediment and phosphate; and a lower spatial priority zone for woodland water quality.

The applicant should note that in all instances the preference should be to utilise blue-green SuDS which provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity); for example, for attenuation features preference should be given to use of swales / ponds / detention basins (if technically feasible) instead of attenuation tanks.

The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features should be provided at an early stage in order to fulfil the requirements of the National Standards for SuDS; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost.

Any proposals must be designed in accordance with the National Standards for SuDS and the latest SuDS Manual (C753). The National Standards for SuDS will be applicable unless the Council's own requirements are more stringent.

The LLFA would consider this to be a greenfield site for the purposes of planning.

The applicant should note the EA's updated climate change guidance (dated 27 May 2022) when preparing the Flood Risk Assessment / Drainage Strategy.

The developer should provide the following information as part of future planning applications in accordance with the [National Standards for SuDS](#):

Standard 1: runoff destinations

- Existing greenfield/brownfield runoff rates for the site.
- Post development runoff rates. These must also be in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- 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.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Standard 2: interception

- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- SuDS source control measures to manage water quantity and maintain water quality will be implemented wherever possible, and throughout the management train, so the development is not reliant upon large attenuation features close to the points of discharge.
- A schedule and plan of interception features must be provided, showing their location, type, and contributing catchment.

Standard 3: management of extreme rainfall and flooding

- A detailed topographical survey that clearly identifies the existing drainage features on the site as well as level contours to show overland flow routes.
- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- The drainage strategy does not increase flood risk as a result of catchment transfer.
- All proposed drainage features are outside flood zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.
- Hydraulic Models should set the MADD factor / additional storage volume factor to 0m³ / ha in order to prevent an overestimation of storage capacity in the proposed drainage network.
- If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.

- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753).

Standard 4: water quality

- The applicant must provide a pollution hazard assessment for all areas draining to SuDS features, and demonstrate that the proposed treatment train achieves the required pollution mitigation indices for suspended solids, metals, and hydrocarbons, using the Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3).
- At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs).
- Calculations and supporting plans must be submitted to evidence compliance.
- A maintenance plan must be provided to ensure the long-term effectiveness of water quality treatment.

Standard 5: amenity

- The applicant must provide details of how SuDS features will deliver amenity benefits, including integration with public open space, accessibility, safety, and opportunities for recreation or education. Plans should clearly show how SuDS contribute to the quality and usability of the site for future occupants and the wider community. Note this may require additional engagement with the council's urban design and landscape officers.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks. A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- A plan showing the cross sections and design of any attenuation pond and its components.
- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
- Groundwater level monitoring (taking into account seasonal variations).
- The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- 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.
- If access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

ADDITIONAL RECOMMENDATIONS

1. The applicant shall provide a complete Drainage Strategy in accordance with the latest [National Standards for SuDS](#).
2. The Environment Agency is to be consulted regarding any anticipated increase in runoff or flow to the main river located north-west of the site.
3. It is noted that the applicant intends to connect to the existing foul and potable water network owned and operated by Wessex Water to serve the proposed development.
 - a. The applicant is to provide written approval from the asset owner for connections to the foul or potable network.
 - b. The applicant is to provide written approval from the asset owner for the adoption of any new sewerage or connections/amendments to the existing network.
 - c. The applicant is to provide written approval from the asset owner regarding the acceptance of any discharge or increase in flow to the existing surface, foul or combined water networks.

The applicant should note that in all instances, the preference of the EA and the LLFA is for foul discharge to be to the foul / combined sewerage network (subject to agreement from the Sewerage Undertaker for the area (Wessex Water)).

INFORMATIVES

The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](#)".

To aid in the development of compliant drainage strategies, the following are recommended without prejudice. We would recommend also utilising the best practice guidance within *The SuDS Manual*, and *Getting SuDS Right from the Start*:

Standard	Best Practice Considerations
Standard 1 – Drainage Hierarchy	• Retain and enhance existing natural drainage features where possible. • Use site layout to maximize opportunities for infiltration and above-ground conveyance. • Identify how communal rainwater harvesting can be utilised to help improve viability of inclusion. • Identify whole-life cost-benefits such as water bill reductions for implementing rainwater harvesting.
Standard 2: Interception	• Use green roofs, permeable paving, rain gardens, and bioretention to maximize interception. • Distribute source control features throughout the site for maximum effectiveness. • Provide a maintenance plan to ensure interception features remain effective.
Standard 3: Management of Extreme Rainfall and Flooding	• Use topographical surveys to identify and preserve natural overland flow routes. • Design SuDS features with freeboard and overflow routes. • Ensure safe access and egress during extreme events. • Consider overland flows originating from outside redline boundary

	• Consider how the drainage systems will perform in the event of blockage and failure
Standard 4: Water Quality	• Use vegetated SuDS (swales, ponds, wetlands) for effective pollutant removal. • Include forebays or sediment traps upstream of main SuDS features. • Provide a maintenance plan for regular removal of silt and debris.
Standard 5: Amenity	• Use gentle side slopes, accessible paths, and seating to make SuDS features usable and attractive. • Involve local communities in the design of SuDS spaces.
Standard 6: Biodiversity	• Design SuDS to create wetland mosaics, wildlife corridors, and habitat connectivity. • Consider how SuDS can help provide wider BNG benefits / credits to the site
Standard 7: Construction, Operation, Maintenance, Decommissioning, and Structural Integrity	• Plan for safe access for maintenance. • Include decommissioning plans for temporary features.

Paddy O'Neill (*AtkinsRéalis – working on behalf of Wiltshire Council Drainage*).