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**Land at Gate Farm,
High Street, Sutton
Benger**

Phase 1

**Geo-environmental
Desk Study**

Land at Gate Farm, High Street, Sutton Benger

PHASE 1 GEO-ENVIRONMENTAL DESK STUDY

For

Gleeson Land Limited

DATE: 21 November 2025

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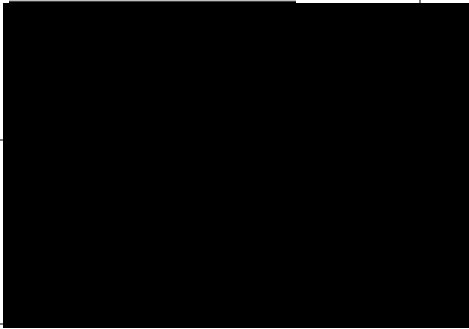
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P1	16/06/25	First Issue
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P4	21/11/25	Proposed development plan updated

Executive Summary

This summary presents the salient points of the report and should not be referred to in isolation.

Instruction	In April 2025 Gleeson Land commissioned Rodgers Leask Ltd (RLL) to compile a Geo-environmental Desk Study (DS) for a Site at Gate Farm, High Street, Sutton Benger, Wiltshire.
Proposed Development	Outline planning application (with all matters reserved except means of access, from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.
Site Location and Description	The Site is located immediately north of the B4069 approximately 500m to the west of the centre of Sutton Benger. It is approximately centred on National Grid Reference 393999E, 178513N. The Site has a roughly rectangular outline, covers an area of approximately 4.97 hectares (ha) and comprises agricultural fields
History	The site has remained greenfield since the earliest mapping.
Geology	Superficial Alluvium and River Terrace Deposits over the Kellaway Sand Member.
Hydrogeology	The superficial River terrace Deposits and Alluvium and the soild Kellaway Sand Formation are classified Secondary A quifers. The site is located within the outer catchment of a groundwater Source Protection Zone (SPZ).
Hydrology & Flood Risk	There is an unnamed watercourse located along the northern site boundary. The northern margin of the site is shown to be located within a Flood Zone 2/3.
Mining	There is no evidence of any mining affecting the site.
Radon	No radon protection measures required.
Ecology and Wildlife	An ancient woodland is located along the northern site boundary. However, wildlife surveys are outside the scope of this report.
Archaeology	Nothing significant identified on site, however advise should be sought from a specialist.
UXB Risk	Low risk.
Public Register Information	No recorded landfills in the vicinity of the site.

Land at Gate Farm, High Street, Sutton Benger

Geo-environmental Desk Study

Potential Contamination Issues	Potential for localised spliages/leakages from the pole mounted transformer and the use of pesticides on site.	
Foundations and Geotechnical issues	Intrusive works shall be required in order to identify ground conditions and provide foundation recommendations for the Site. However, based on the published geology we expect the site to be suitable for conventional strip/trench fill foundations founded in the Kellaway Sand Formation or the River Terrace Deposits.	
Risk Register	Soil & groundwater contamination	Low to Moderate
	Asbestos	Low
	Soil gas	Low
	Flooding	Moderate
	Foundations	Low to Moderate
	Excavations	Low to Moderate
	Surplus topsoil	Low
	Earthworks	Low
	Drainage	Low

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1.0 Introduction

1.1. Terms of Reference

In April 2025 Gleeson Land commissioned Rodgers Leask Ltd (RLL) to compile a Geo-environmental Desk Study (DS) for a Site at Gate Farm, High Street, Sutton Benger, Wiltshire.

1.2. Proposed Development

Outline planning application (with all matters reserved except means of access, from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.

A copy of the Illustrative site layout (drawing STN-GEN-SW-DR-MP-06 A) is included in Appendix A.

1.3. Objectives

The objectives of the investigation were to:

- Obtain desktop study information to assist in the assessment of potential environmental and ground related issues that may have implications for proposed development.
- Produce a conceptual model for the Site using the findings of the desktop study.
- Highlight potential geo-abnormals which may affect the development Site.

1.4. Scope

In order to achieve the outlined objectives, the scope of the study encompassed:

- A Site walkover survey.
- A study of historical maps.
- Review of geological and mining information.

- An examination of regulatory authority information.
- Undertaking a Historic Environmental Record Search.
- A screen for unexploded bombs (UXB).
- Production of a conceptual model.

1.5. Pernicious Plants

No assessment has been made for the presence of pernicious plant species e.g. Japanese Knotweed, Giant Hogweed, within the remit of this investigation.

1.6. Limitations and Confidentiality

All conclusions and recommendations made within this report are based upon and limited to the factual information obtained as part of this investigation. No responsibility can be taken by RLL Ltd for information obtained by third parties and it has been assumed that all third-party information provided is true and correct.

RLL Ltd has undertaken the work in accordance with our understanding of current best practice at the time of undertaking the report. Further assessment and revision of the report may be required should new information come to light or legislation/changes to best practice be introduced after the date of issue of the report.

RLL Ltd has prepared the report for the sole use and reliance of the Client. The report may not be used or relied upon by any unauthorised third party without the explicit written agreement of RLL Ltd.

The interpretive work undertaken within this report remains the intellectual property of RLL Ltd and must not be divulged to any commercial third party without prior written agreement of RLL Ltd.

2.0 Site Location and Description

2.1. Site Location

The Site is located immediately north of the B4069 approximately 500m to the west of the centre of Sutton Benger. It is approximately centred on National Grid Reference 393999E, 178513N.

A plan of the Site is presented in **Appendix A**. The boundary of the Site is indicated by the red line.

The land within the red line boundary will henceforth be referred to as the "Site".

2.2. Site Description

A Site walkover was undertaken by RLL in May 2025. The purpose of the Site walkover was to provide a general description of the Site. Detailed surveys such as wildlife or trees surveys were outside the scope of this report.

The Site has a roughly rectangular outline, covers an area of approximately 4.97 hectares (ha) and comprises agricultural fields. The Site was accessed via a track and gate in the eastern corner of Site, off the B4069. The following features were noted during the walkover:

- Overhead electricity cables trend north to south in the eastern portion of Site. There is a pole mounted electricity transformer present on site;
- A raised manhole is located in the northwest corner of the central field, associated with a foul water sewer trending northwest to southeast across the centre of Site;
- An unnamed watercourse flows west to east adjacent to the northern boundary. Adjacent to the northwest corner of Site is a man-made lake draining into the watercourse via a series of overflows, sluice gates and weirs.

A photographic report of the Site walkover is presented in **Appendix B** and a Site walkover plan in **Appendix A**.

2.3. Topography

The Site is relatively flat, with levels reaching the highest point in the southwest corner and falling northwards.

2.4. Site Boundaries

The boundaries of the Site comprise:

- Ancient woodland and an unnamed watercourse to the north.
- The west of Site is bounded by an electric fence and sparsely vegetated hedgerow.
- A hedgerow and the B4069 to the south.
- The eastern boundary comprises a hedgerow and wall, that forms the back of a garden of an adjacent residential property, there is also a disused swimming pool adjacent to the boundary.

2.5. Site Access

Vehicular and pedestrian access is gained from the B4069 in the southeast corner of Site.

2.6. Surrounding Area

- North – Ancient woodland beyond which lies further agricultural land, woodland and the M4, trending east to west.
- West – Further agricultural land and the village of Draycot Cerne.
- South – The B4069 and adjacent residential properties, beyond which lies further agricultural land.
- East – Residential properties comprising the village of Sutton Benger.

3.0 Historical Review

3.1. Ordnance Survey Maps

Historical Ordnance Survey Maps at various scales have been obtained via an EmapSite MapInsight Report in order to review the historical land use on the Site. These maps are presented within **Appendix C**.

A summary of the historical features is as follows:

Map Date	Site Feature	Adjacent Features
1885 1:10,560	The majority of Site comprises one larger rectangular field. A second field forms a narrow corridor wrapping around the eastern and northern boundary of the main field. An unnamed watercourse forms eastern part of the northern boundary.	Immediately to the east is the village of Sutton Benger comprising residential properties and Manor Farm. Gate Farm is indicated adjacent to the southeast corner of Site. An unnamed road forms the southern boundary of Site running east to west. An unnamed watercourse flows west to east immediately north of Site. It has been dammed to form a lake, adjacent to the northwest corner of Site, associated with Draycot House 450m northwest. A pumping house is also indicated. The associated estate, Draycot Park lies immediately west and north of Site, extending northwards comprising areas of ancient woodland and managed estate. The majority of the surrounding land comprises agricultural fields and associated farms. A cemetery is located 750m west of Site, alongside a small cluster of residential properties labelled Upper Draycot.
1886 1:2,500	No significant changes.	A series of weirs and overflows are indicated where the lake drains into the watercourse to the north of Site. Multiple footbridges are shown to span the watercourse. The pumping house is no longer shown.
1899 1:10,560	No significant changes.	An Old Gravel Pit is indicated approximately 450m northeast. Upper Draycot is now labelled Draycot.
1900 1:2,500	Trees lining the boundary between the two fields are no longer shown.	No significant changes.

Map Date	Site Feature	Adjacent Features
1923 1:2,500	No significant changes.	No significant changes.
1925 1:10,560	No significant changes.	No significant changes.
1956-1960 1:10,560	No significant changes.	One of the large structures associated with Draycot House is no longer indicated. The road forming the southern boundary of Site is labelled the A420.
1974 1:10,560	No significant changes.	The M4 is shown approximately 800m north of Site trending east to west. A new road is indicated to the northeast, bridging the M4 leading into Sutton Benger.
1979-1980 1:2,500	No significant changes.	Multiple rectangular structures are indicated immediately adjacent to the eastern boundary of Site, with some labelled 'Movable Glass'. Two residential properties are indicated to the south of the A420. The area of woodland to the north of Site is labelled The Shrubby. A small pond is indicated, associated with Gate Farm, 100m southeast of Site.
1980-1983 1:2,500	No significant changes.	No significant changes.
1981-1982 1:10,000	No significant changes.	Extensive residential development is indicated to the south of Sutton Benger. A factory is shown to the north of Sutton Benger and the road running through Sutton Benger is labelled High Street.
1994 1:2,500	No significant changes.	No significant changes.
2001 1:10,000	No significant changes.	No significant changes.
2003 1:1,250	No significant changes.	No significant changes.
2010 1:10,000	No significant changes.	No significant changes.

Map Date	Site Feature	Adjacent Features
2025 1:10,000	No significant changes.	Further residential development and associated highways are indicated to the south and east of Site in Sutton Benger. The rectangular structures to the east of Site are no longer shown. The factory to the north of Sutton Benger is no longer shown, replaced by residential properties.

3.2. Summary

The earliest historical maps available from 1885 show the Site was greenfield comprising two agricultural fields. There were no significant changes on Site until present day with the exception of the disappearance of some trees lining the boundary between the two fields, indicated on the 1900 1:2,500 maps.

The surrounding area predominantly comprised agricultural fields, Sutton Benger to the east, Draycot to the west and Draycot House and associated estate to the north. Notable residential development of Sutton Benger is indicated on the 1981-1982 1:10,000, this also included the appearance of a factory to the north, shown on the 2025 1:10,000 maps. Notably, the construction of the M4 approximately 800m north of Site, is indicated on the 1974 1:10,560 maps.

A sizeable part of Draycot House is no longer indicated on the 1956-1960 1:10,560 maps. The land had been sold separately and was owned by farmers at this point. The house was too large for their needs and was subsequently demolished between 1952 and 1954. Draycot Lake was excavated around 1773 – 1775 and restored in 1990 to present day state¹.

¹ [Draycot House, Park and Gardens. – History of the Draycot Estate](#)

4.0 Geology, Hydrology, Hydrogeology and Mining

Information regarding the geology and associated conditions at the Site has been obtained via a GroundSure Enviro+Geo Insight report, a copy of which is included in **Appendix D**.

4.1. Geology and Hydrogeology

4.2. Published Geology

Information considered pertinent to the Site is presented below.

	Geological Unit	Permeability	Aquifer status (descriptions below table)
Superficial Deposits	Alluvium	On Site – intergranular flow type - very low to high permeability	Secondary A
	River Terrace Deposits	On Site – intergranular flow type - high to very high permeability	Secondary A
Bedrock Geology	Kellaway Sand Member	On Site – mixed flow type – moderate permeability	Secondary A in the northern half of Site and Unproductive in the south.

Secondary A aquifer contain permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.

4.3. Structure

No linear bedrock features are mapped on Site.

1 No. normal fault is located within the Site vicinity running southwest to northeast approximately 182m northwest of Site.

4.4. BGS Borehole Records

No BGS borehole records within 250m of Site.

4.5. Groundwater Abstractions

There are no records of potable water abstractions within 2000m of Site.

There is a single active groundwater abstractions located 869m southwest and is related to 'Ground Water – Fresh, General Use Relating To Secondary Category (Medium Loss)'.

4.6. Source Protection Zone

The Site lies within a SPZ Zone 2c (Outer catchment within confined aquifer).

4.7. Groundwater Vulnerability and Soil Leaching Potential

Information presented in the Groundsure Enviro+Geo Insight Report (**Appendix D**) indicates the northern half of Site as having high groundwater vulnerability and the southern half of Site is classified as an Unproductive Aquifer. The assessment of groundwater vulnerability is based on a 1km grid and areas of high vulnerability are defined as:

'Areas able to easily transmit pollution to groundwater. They are likely to be characterised by high leaching soils and the absence of low permeability superficial deposits.'

The River Terrace Deposits along the eastern boundary of Site are classified as a High Leaching Potential with an Infiltration value of >70% and a dilution value of 300-500mm/year. The underlying Kellaway Sand Member is classified as having an Intermediate Leaching Potential with an Infiltration value of >70% and dilution value of 300-500mm/year.

The western half of Site lies within a km grid square where there is soluble rock risk defined as:

'Significant soluble rocks are likely to be present. Problems unlikely except with considerable surface or subsurface water flow.'

4.8. Hydrology and Flooding

	Summary
Surface Water features	On-Site: 1 No. records of surface water features, relating to the watercourse to the north of Site, forming the eastern part of the northern boundary. Off-Site: 5 No. further surface water features are recorded within 500m of the Site. The most notable being Draycot Lake, between 50m and 300m to the northwest.
Biological & Chemical Data	2 No. records identified. The majority of Site lies within the catchment area for the Sutton Benger Brook – source to conf R Avon (Brist) Water Body, relating to the watercourse to the north and the southeast corner lies within the catchment area for Avon (Brist) conf Tetbury Avon to conf R Marden Water Body. Both recorded a Fail in regard to Chemical rating due to exceedances in Mercury and Polybrominated diphenyl ethers and have an Ecological rating of Good and Moderate, respectively. Both records are from 2019.
Surface Water Abstractions	1 No. historical surface water abstraction 52m to the northeast relating to 'Spray Irrigation – Direct' from Sutton Benger Brook. No expiry date is given.
Flood Risk	The northern boundary of the Site is recorded as being located within Zone 2 and 3 flood plains, associated with the watercourse immediately north.. - Flood Zone 2 designations are given to land with between 1% and 0.1% annual probability of river flooding or between 0.5% and 0.1% risk of sea flooding. - Flood Zone 3 designations are given to land with a 1% annual probability or greater of fluvial flooding or a 0.5% annual probability or greater of sea flooding. The Risk of Flooding from Rivers and the Sea (RoFRaS) rating is classified as High to Medium around the northern boundary of Site, again associated with the watercourse to the north.

4.9. Radon

The Site is not in a radon affected area, as less than 1% of properties are above the action level. Therefore, radon protective measures are not required for new developments.

4.10. Mining and Ground Workings

	Summary
Ground Workings map	Historical: On-Site No records on-Site. Off-Site 8 No. records for ground workings recorded within 200m of Site five of which relate to Draycot lake 52m to 54m west. Other records relate to a pond 97m southeast and 180m northeast.

	Summary
Mining, Extraction and Natural cavities	No records.
Coal Mining	The Site does not lie within a 'Coal Mining Report Area' as defined by the Coal Authority.
Non-Coal Mining / Mineral Extraction	No. records.
Non-Coal Mining Cavities / Natural Cavities	No records.
Brine / Gypsum Extraction	No.
Clay Mining	No.

4.11. Potential for Natural Ground Subsidence

Hazard	Hazard Rating	Comments
Shrink -Swell Clays	Negligible to Very Low	Ground conditions predominantly non-plastic to low plasticity. Very Low hazard rating associated with the alluvium present around the watercourse in the north of Site.
Landslides	Very Low	Slope stability problems are unlikely to be present.
Ground Dissolution of Soluble Rocks	Negligible	'Soluble rocks are either not thought to be present within the ground, or not prone to dissolution. Dissolution features are unlikely to be present.'
Compressible Deposits	Negligible to Moderate	The majority of Site has a Negligible hazard rating, however, the alluvium in the north of Site has a Moderate hazard rating, associated with the Alluvium deposits defined as ' <i>Compressibility and uneven settlement hazards are probably present. Land use should consider specifically the compressibility and variability of the Site.</i> '
Collapsible Deposits	Negligible to Very Low	The alluvium in the north of Site classed as Negligible hazard rating and the rest of the Site is classed as Low Risk, meaning that ' <i>deposits with potential to collapse when loaded and saturated are unlikely to be present.</i> '
Running Sands	Very Low to Low	The majority of Site is deemed as Very Low hazard rating where running sands are unlikely. However, the eastern portion of Site is Low risk, where running sands may be present, associated with the River Terrace Deposits in the east.

4.12. Estimated background soil chemistry

The following estimates are provided for the Site based upon Rural soil:

Arsenic mg/kg	Cadmium mg/kg	Copper mg/kg	Nickel mg/kg	Lead mg/kg
18.90 – 33.40	0.00 – 0.33	15.40 – 21.60	23.50 – 31.90	33.20 – 47.10

4.13. Railways and Tunnels**4.14. Tunnels**

No records of tunnels are identified within or within 250m of, the Site boundary.

4.15. Historical Railways

No records of historical railway or tunnels are identified within the Site boundary, or within 250m of the Site.

4.16. Active Railways

No records of active railways are identified within the Site boundary, or within 250m of the Site.

4.17. HS2

The Site does not lie within 5km of HS2.

4.18. Coal Authority records

The Site does not lie within a Coal Authority reporting area.

No further action is therefore considered necessary in this regard.

5.0 Environmental Database records and UXO

5.1. Regulatory data

Data regarding Environment Agency and Local Authority regulatory information has been obtained via a GroundSure Enviro+Geo Insight report, a copy of which is included in **Appendix D**.

Information considered pertinent to the Site is presented below.

Category		Summary
Historical Industrial Sites from 1:10,000 mapping	Potentially contaminative use within 500m	On-Site 1 No. records on Site, relating to the pumping house indicated on the 1925 maps, associated with the watercourse to the north. Off-Site 13 No. historical records off-Site relating to an Unspecified Factory 253m east and Unspecified Tanks 371m northeast, present on 1982 maps, a Refuse Heap 439m northeast present on the 1885 maps and an Old Gravel Pit, indicated on the maps from 1899 – 1960.
	Historical Tank Database	On-Site No records. Off-Site 12 No. historical records for the Unspecified Tanks, Tanks and Gasometer between 415m and 291m from Site.
	Potentially infilled Land within 250m	On-Site No records. Off-Site No records.
Environmental Permits, Incidents and Authorisations	Part IIA EPA 1990	The Site is not determined as Contaminated Land.
	Records of List 2 Dangerous Substance Inventory Sites	No records.
	Licensed Discharge Consents	On-Site No records. Off-Site 1 No. records relating to 'Miscellaneous Discharges – Surface Water' into 'Trib of River Bristol Avon', revoked in 2016.

Category		Summary
	<i>Pollution Incidents</i>	6 No. records within 500m of Site. The most severe relating to a Category 2 incident in 2006 regarding to Air Impact. 4 No. records relate to a Category 3 Water Impact.
Landfills and other Waste Disposal Sites	<i>EA registered, BGS survey, Local Authority and Historical Mapping</i>	No records within 250m.
Current land Use	<i>Current Industrial Sites</i>	1 No. record at 123 m north for a Telecommunications mast..
Designated Environmentally Sensitive Sites	<i>SSSI's, NNR's, AONB's</i>	1 No. record of an SSSI 769m southeast relating to Sutton Lane Meadows. 1 No. record designated Ancient Woodland relating to the Weir Wood 1m to the north of Site. There are no other records of environmentally sensitive Sites within 1km of Site.

5.2. Unexploded Bombs (UXB)

Regional Unexploded Bomb Risk maps obtained from Zetica indicates that the Site is in a Low risk area for Unexploded Bombs (UXB). A copy of the risk map is included in **Appendix E**.

Zetica state that low-risk regions are those with a bombing density of up to 15 bombs per 1000 acres or less. These areas are considered to have significant but low UXB risk. In general, further action to mitigate the risk is considered prudent, although not essential. Care is required when assessing the risk for specific Sites where the risk may be higher because of local wartime activity.

Given that the Site has historically remained undeveloped and that the historical maps do not show any obvious signs of wartime activity within the Site locality, the risk of encountering UXB is therefore considered low. No further risk assessment is therefore considered to be required in this regard.

5.3. Archaeology

A preliminary search of the Heritage Gateway archaeological database (www.heritagegateway.org.uk, accessed October 2019) indicates nothing of significance on-Site, the following features were noted in close proximity to Site:

- Draycot Park – Historic parkland adjacent to the east, west and north boundaries of Site, extending northwards.

- Partially extant 17th century farmstead relating to Gate Farm, adjacent to the southeast corner of Site.

Local Historic Environment Records (HER) databases may contain more detailed information on the archaeology of the Site.

6.0 Conceptual Site Model (CSM)

This section provides a qualitative risk assessment of the risk posed from potential on and off-Site contamination sources, identified by the information presented in the previous sections.

The conceptual model below has been developed based on the commonly adopted source-pathway-receptor model as recommended within Land Contamination Risk Management (LCRM). A visual representation of the CSM is included in **Appendix A**.

6.1. Proposed Development

It is proposed to redevelop the Site into residential dwellings with gardens, landscaped areas and an area of public open space.

6.2. Potential Sources of Soil Contamination related to the Sites past and current use

6.3. On-Site

The Site has historically been greenfield comprising agricultural land. Potential contaminants associated with this use are detailed below.

Source	Site Area	Key Contaminants
Alluvium	Along the northern boundary.	If the alluvium contains organic peat then there is a potential for ground gas migration on to the site.
Agricultural land	Sitewide.	Pesticides / Herbicides.
Pole mounted transformer	Localised	Petroleum hydrocarbons / PCBs

6.4. Off-Site

There is potential for Made Ground associated with the residential properties to the east and south of Site as a source of contamination. Potential contaminants associated with this use are detailed below.

Source	Site Area	Key Contaminants
Made Ground	Residential properties to the east and south.	Heavy metals, PAHs, hydrocarbons and asbestos.

6.5. Ground Gassing

No landfill Sites are or have been situated within 250m of the Site. The Site is not underlain by coal seams which may give rise to gas. The Alluvium present along the northern part of the site has potential to generate ground gases if it contains organic peat.

A number of potential infilled features have been identified within 500m of the Site, such as the Old Gravel Pit and the historical unknown factory to the northeast and the cemetery to the southwest, however given the distances from the Site, these are unlikely to present a significant source of ground gas and have not been recorded as landfills.

6.6. Potential Pathways

With regard to the assessment of risk to human health, the following pathways are considered to be potential exposure routes based on residential end-use, in accordance with the CLEA Documentation:

- Dermal contact.
- Direct ingestion of soil.
- Inhalation and ingestion of soil dust.
- Inhalation of gases.
- Ingestion of contaminated water via plastic pipes.

With regard to Controlled Waters, the following pathways are considered applicable:

- Downward infiltration through soils and bedrock
- Lateral migration through soils and bedrock towards the nearest surface feature
- Newly created preferential pathways associated with the redevelopment of the Site e.g. deep boreholes/piles/sewers.

6.7. Potential Receptors

The following are considered to be potential receptors for contamination:

Receptor		Additional information
Human Health	Site end users	A female child will be regarded as the critical receptor.

Receptor		Additional information
	Construction/maintenance workers Site visitors	
Controlled Waters	Alluvium, River Terrace Deposits, Kellaway Sands Member – Secondary A Aquifer and SPZ	Alluvium is located in the north of Site, associated with the watercourse. River Terrace Deposits outcrop in the east of Site, tapering towards the southeast corner. Kellaway Sand Member underlies the entirety of Site, however, is classed as a Secondary A Aquifer in the north of Site and as an Unproductive Aquifer.
	Watercourse to the north of Site.	
Other	Neighbouring buildings	Residential properties to adjacent to Site to the east and south.
	Ancient Woodland	Flora and fauna associated with the ancient woodland to the north of Site.

6.8. Pollutant linkages

Based on the information above, the following potential pollutant linkages are considered applicable to the Site. The risk classification has been qualitatively derived in accordance with LCRM. The terminology used is taken from CIRIA C552, and a summary of the principal terms are provided in **Appendix F**. The Conceptual Site Model is presented in **Appendix A**.

Source	Pathway	Receptor	Probability	Consequence	Risk
Contaminated Soils	Ingestion of soil, dermal contact, inhalation of dust	Site end users Construction workers; maintenance workers; Site visitors	Low likelihood	Medium	Moderate
Contaminated Soils	Inhalation of soil dust	Members of the public adjacent to the Site during construction	Low likelihood	Medium	Moderate
Contaminated Water Supplies	Ingestion of water, Migration of organic contaminants via plastic pipes	Humans – Site End Users; Site visitors; construction workers; maintenance workers; ancient woodland	Unlikley	Medium	Low

Source	Pathway	Receptor	Probability	Consequence	Risk
Contaminated Soils and Groundwater	Leaching and groundwater flow to surface water	Site End Users; Site visitors; construction workers; maintenance workers; watercourse to the north of Site; ancient woodland; 1 No. groundwater abstractions are active 869m southwest	Unlikley	Medium	Low
Contaminated Soils and Groundwater	Downward migration into groundwater.	Secondary A Aquifer – Alluvium, River Terrace Deposits, Kellaway Sand Member	Low likelihood	Medium	Low
Contaminated Soils and Groundwater	Leaching of sulphate and corrosive contaminants	Buried concrete structures and services; proposed infrastructure; ancient woodland	Low likelihood	Mild	Low
Ground gasses from made ground and natural soils	Migration of asphyxiant and explosive gasses into confined spaces	Site end users, construction/ maintenance workers in trenches; Site visitors; proposed infrastructure	Low likelihood	Medium	Moderate/Low

7.0 Conclusions and Recommendations

7.1. Site setting and historical development

The Site comprises two agricultural fields located near Sutton Benger in Wiltshire.

The Site was greenfield comprising agricultural fields. No further significant land uses have been identified.

A watercourse flows adjacent to the northern boundary of the Site.

The north of Site is bounded by the watercourse and ancient woodland. The east, by a wall and hedgerow forming the back of adjacent residential properties. To the south is a hedgerow and the B4069 and to the west is a sparsely vegetated hedgerow and electric fence.

The high point is in the southwest corner with levels falling northwards.

The Site is indicated to be underlain by Alluvium and River Terrace Deposits forming the superficial deposits, both classified as Superficial A Aquifer. Bedrock comprises the Kellaway Sand Member, classified as a Secondary A Aquifer in the northern portion of Site and an Unproductive Aquifer in the south.

7.2. Planning/Enabling Works Considerations

Any clearance of existing hedgerows and trees required to facilitate some of the development should be undertaken outside of bird nesting season. A survey should be undertaken prior to removal of any trees/hedges in order to enable foundation design with respect to tree influence should new structures be proposed. The survey should include boundary vegetation and extend beyond the Site boundary to cover any trees that may influence the foundations of proposed structures.

Based on the Sites past historical use and as no Made Ground or existing structures were noted during the walkover, the Site is considered low risk for asbestos.

7.3. Flood Risk

The northern boundary of the Site is recorded as being located within a Zone 2 and Zone 3 flood plain, associated with the watercourse immediately north. The remainder of the Site does not lie in a Flood Zone.

As such, available information would suggest that the northern boundary of the Site that lies within a Flood Zone (FZ) 3 is considered to be at medium to high risk of flooding. However, this preliminary risk assessment should be confirmed by carrying out a Flood Risk Assessment (FRA) for the Site.

7.4. Access

Vehicular and pedestrian access is gained from the B4069 in the southeast corner of Site.

7.5. Qualitative contamination risk assessment

Historically, the Site is indicated to have been greenfield, comprising agricultural fields, and remain largely unchanged until present day.

The majority of the Site is indicated to be underlain by natural strata and it is therefore considered there is a low risk of contamination existing from past land use, but this should be confirmed through testing of soils at the ground investigation stage prior to construction.

The risk to Controlled Waters from on-site soils and groundwater is considered Low on the basis of current information given the presence of the adjacent watercourse to the north, the underlying aquifer classifications (Secondary A for superficial deposits and bedrock in the northern portion of Site and Unproductive for bedrock in the southern portion of Site) from the Site. Should contaminants be present within soils, the risk that they will affect groundwater and subsequent surface waters shall be related to the mobility of the contaminants, the permeability of strata and distance to receptor. The sensitivity of the Site with respect to the identified controlled water receptors is considered low to moderate at this stage.

7.6. Ground Gas

The CSM has indicated the gas generation potential is generally considered to be low, with potential sources limited to the Alluvium to the north of Site and Made Ground associated with adjacent residential properties and infrastructure.

The sensitivity of the proposed development in accordance with CIRIA C665 is considered to be high given the intended residential end use and would equate to building type 'A' in accordance with British Standard BS8485:2015+A1:2019.

Low level gas protection measures in accordance with a CS-2 (CIRIA C655) or Amber 1 (NHBC Traffic Light System) may be required and should be confirmed by an appropriate ground gas risk assessment and/or intrusive investigation. Given the presence of historical coal mining features within the Site, a mine gas risk assessment in accordance with the CL:AIRE published document "Good Practice for Risk Assessment for Coal Mine Gas Emissions (October 2021)" is recommended to confirm the risk.

During construction works, entry into deep trenches should be avoided, gas may accumulate within the confined space created. Permit to work systems and personal gas monitors may be required for such works.

No radon protection measures are necessary for new structures.

7.7. Surface water drainage

The geology would suggest the strata may be suitable for infiltration of surface water for the proposed development, subject to confirmation of infiltration rate through on Site testing. Infiltration rates are likely to be dependent on particle size distribution of weathered deposits and bedrock characteristics, fine and well graded materials generally provide slower rates of infiltration. The southern area is likely to provide slower rates associated with siltstone and mudstone and more not be suitable.

The proximity of the watercourse to the north suggests that groundwater may be high in the Site locality which may preclude the use of soakaways.

7.8. Foundation Design and Geotechnical issues for construction

Intrusive works shall be required in order to identify ground conditions and provide foundation recommendations for the Site.

The BGS have indicated the majority of the Site to be considered Negligible to Low hazard ratings for natural subsidence. However, a high groundwater table may be anticipated given the proximity of the nearby watercourse and the granular nature of the Superficial Deposits.

The geology suggests that traditional strip/trenchfill foundations may be appropriate, subject to verification by intrusive investigation, and provided foundations are placed below any made ground. The presence of a high

groundwater table may reduce allowable bearing capacities within the granular Superficial Deposits and stability may be an issue for trench construction; ground improvement in the form of vibro stone columns may provide a suitable alternative and reduce the requirement for de-watering or shoring.

A tree survey shall be required which extends beyond the Site boundaries for use in foundation design, the published geology suggests that soils which may be subject to volume change due to tree influence exist beneath the Site. Plots positioned within close proximity to trees may require deepened foundations or piled foundations to mitigate the risk of heave OR although on the basis of current information, the Site is likely to be underlain by granular strata which is unlikely to be subject to volume change.

Significant problems with groundwater may be possible based upon the geology. Dewatering of excavations is likely to be required. Stability issues may arise, particularly where excavations are taken below the groundwater table.

The BGS do not indicate any other significant potential ground subsidence hazards. However, it is noted that the Site lies within an area underlain by chalk bedrock. There is therefore a potential for ground dissolution features to exist, such as dolines (sink holes). The risk of sinkholes is increased where chalk bedrock is overlain by superficial soils, where fines may be washed out resulting in settlement. The BGS indicate a very low risk in this regard, however the potential for unrecorded features cannot be discounted; an appropriate level of Site investigation should be undertaken to confirm this risk.

7.9. Mining and Geological Issues

The Site does not lie within a Coal Authority reporting area and hence the risk of subsidence related to underground mining is considered to be negligible.

7.10. Radon

No radon protection measures are required.

7.11. Ecology and Wildlife Issues

Wildlife surveys are outside the scope of this report. However, there is an area of woodland indicated as The Shrubbery approximately 1m north of Site.

7.12. Archaeological Issues

A preliminary archaeological database search suggests there are no features of significance recorded on Site. Local HER databases may contain more detailed

records and it is recommended that early consultation is made with the Local Authority Planners to confirm the requirement for any further action prior to development.

7.13. UXB

Regional Unexploded Bomb Risk maps obtained from Zetica indicates that the Site is in a Low risk area for Unexploded Bombs (UXB). Given that the Site has historically remained a farm or has been undeveloped, and that the historical maps do not show any obvious signs of wartime activity within the Site locality, the risk of encountering UXB is therefore considered low. No further risk assessment is therefore considered to be required in that regard.

7.14. Geo-environmental Abnormal Risk Register

The following table presents a summary of the main risks identified by the CSM. The table should be read in conjunction with the main body of the report and not in isolation.

Hazard/ Risk	Cause	Risk Rating	Recommendations
Soil & groundwater contamination	Potential made ground – not anticipated on Site.	Moderate/Low	Intrusive ground investigation required.
Asbestos	Not anticipated on Site.	Low	Asbestos survey prior to demolition/construction. Ensure removal of asbestos in accordance with Control of Asbestos Regulations (2012).
Soil Gas	No Made Ground anticipated on site, however low risk from peat within the Alluvial soils.	Low	Intrusive ground investigation required.
Flooding	Northern boundary of Site lies within Flood Zone 2 and 3.	Moderate	Undertake Flood Risk Assessment. Minimum FFLs may be stipulated by planning.
Foundation Design / Geotechnical issues	Potential for shallow groundwater.	Moderate/Low	Intrusive ground investigation required.
Excavations	Instability in granular deposits. Shallow groundwater	Moderate/Low	Shoring and dewatering may be required. Alternative foundation solutions may provide economy.

Hazard/ Risk	Cause	Risk Rating	Recommendations
Surplus topsoil	Potential for pesticides to be present.	Low	Characterise topsoil. Re-use of topsoil on-Site where possible. Allow for off-Site disposal of surplus topsoil.
Earthworks	Unsuitable materials may require stabilisation to ensure geotechnically suitable for use.	Low	Intrusive investigation required. Importation of material may be required to meet minimum FFLs. Place fill material in accordance with an Engineers Specification.
Drainage	Natural soakaways may be possible; granular deposits mapped but groundwater may be high.	Low	Intrusive investigation required. Drainage assessment required.

7.15. Recommended further works

An intrusive Ground Investigation shall be required to confirm ground conditions, the contaminative status of the Site, and suitable foundation and floor slab solutions for the proposed development. On the basis of current information, suitable methods of investigation are likely to comprise:

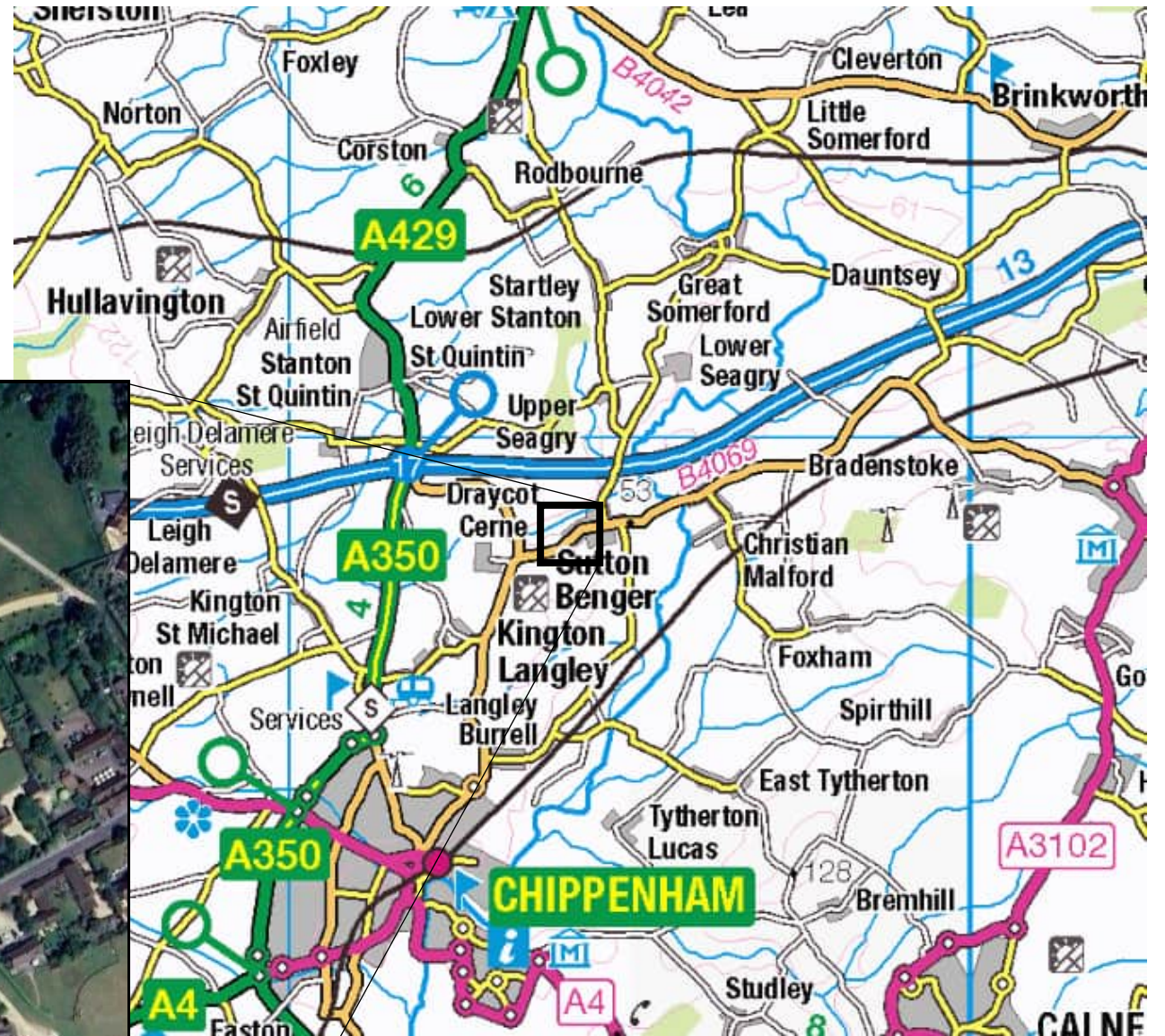
- Trial Pits to log ground conditions, assess excavation stability and obtain samples for laboratory testing.
- Window Sample/Cable Percussion boreholes to facilitate in-situ testing, the installation of gas and groundwater monitoring standpipes and soil sampling.
- TRL DCPs targeting highways to provide a preliminary CBR value.
- Infiltration testing to determine the suitability of soakaway drainage.
- Soil contamination laboratory testing to enable a human health risk assessment with regard to potential contamination identified on Site.
- A programme of soil gas monitoring to assist with establishing the gassing regime of the Site and inform a ground gas risk assessment.
- Groundwater sampling and testing to assess the risk posed to controlled waters.
- Sulphate testing to assess the risk to buried concrete.

8.0 References

1. British Standards Institution. BS 5930:2015+A1:2020. Code of practice for ground investigations.
2. British Standards Institution. BS 10175:2011+A2:2017. Investigation of potentially contaminated Sites – Code of practice.
3. British Standards Institution. BS 8485:2015+A1:2019. Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings.
4. British Standards Institute. BS EN ISO 21365:2020. Conceptual Site models for potentially contaminated Sites.
5. Contaminated Land: Application in Real Environments. Good Practice for Risk Assessment for Coal Mine Gas Emissions. October 2021,
6. Construction Industry Research and Information Association. 2008. Assessing the risk posed by hazardous gases to buildings. C665.
7. Environment Agency. Land Contamination Risk Management (LCRM). Published 8th October 2020.

Appendices

Appendix A: Drawings



Legend:

Current Site Boundary

Project ID:

P25-317

Project Title:

Land at Gate Farm,
Sutton Benger

Client:

Gleeson Land Ltd

Title:

Figure 1 – Site Location Plan

Scale:

Not to scale

Engineer:

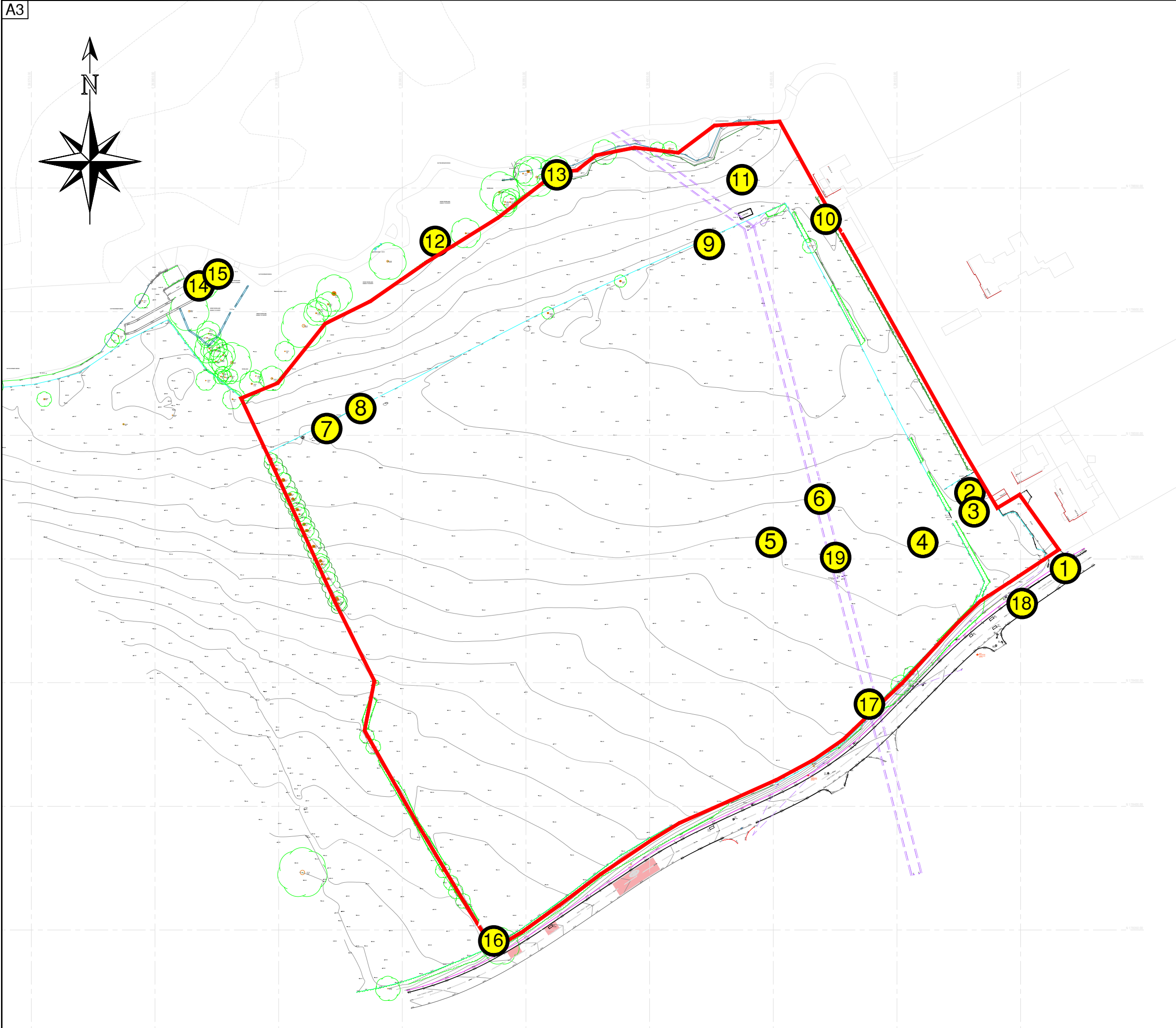
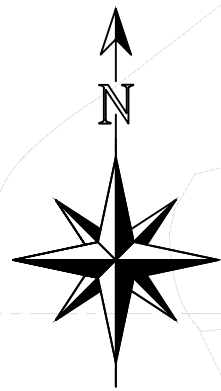
JC

Contractor:

Date:

Nov 2025





Key

-  Photograph number and location
-  Direction of photograph
-  Site Boundary
-  Overheads

P01	11.06.25	First Issue	JC	AJ	
Rev	Date	Amendments	By	Chk	



Client

Gleeson Land Ltd

Project

Land at Gate Farm, High Street,
Sutton Benger

Drawing Title

Site Walkover Plan

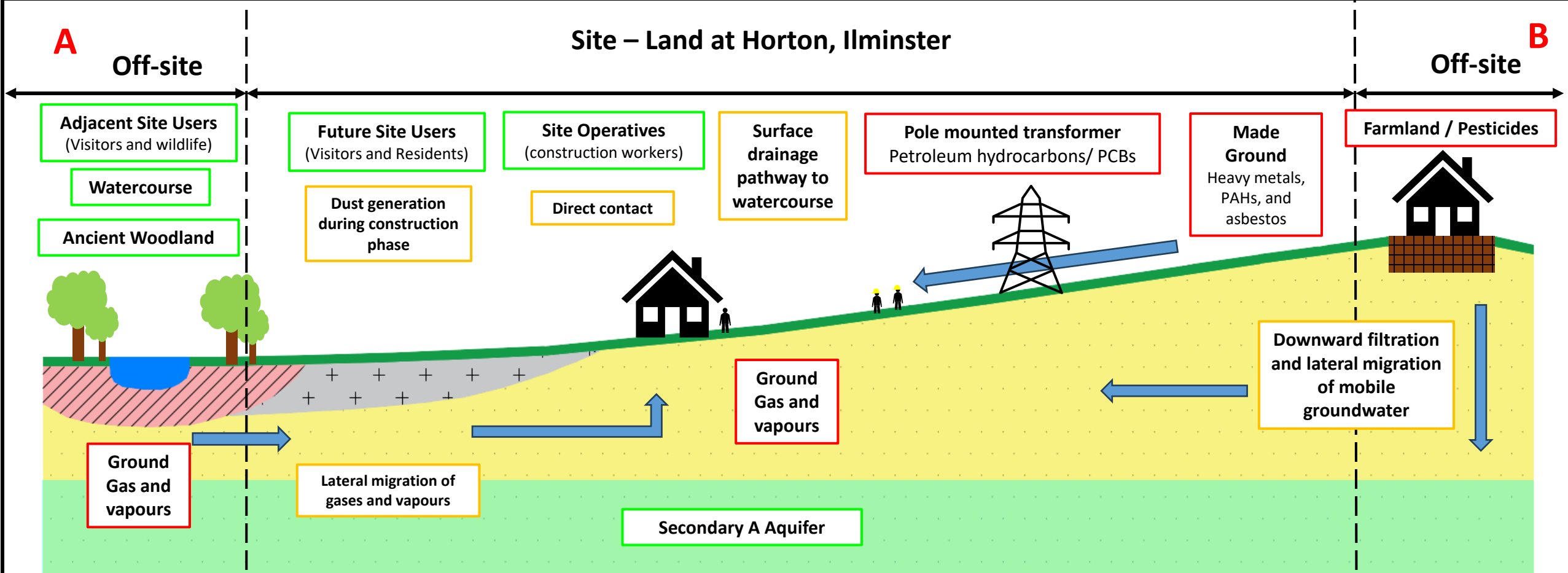
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Scale	Drawn	Checked	Date
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Drawing Number	Revision
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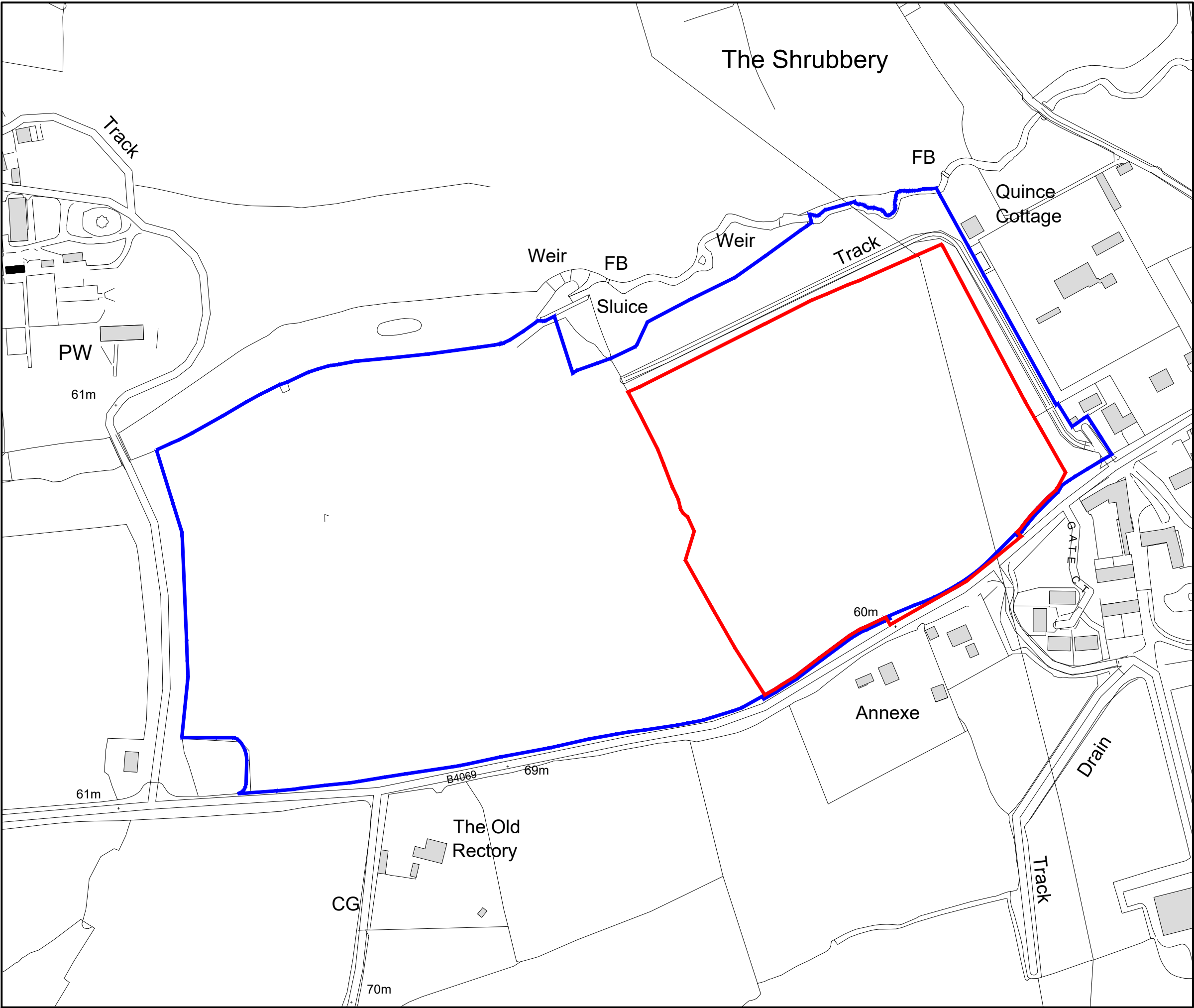
BIM Drawing Reference

Scale Bar



Conceptual Site Model		
Source	Pathways	Receptor
Adjacent Farmland – Pesticides	Direct Contact – dermal contact, absorption through skin, ingestion.	Human Health -Construction Workers -End Users -Adjacent visitors
Residential properties – Made Ground	Inhalation of contaminants in soils/dust/fibres.	Wildlife
Pole mounted transformer – petroleum hydrocarbons/ PCBs	Potential migration of leachable contaminants through drainage and mobile groundwater.	Controlled Waters - Secondary A Aquifer (Alluvium, River Terrace Deposits, Kellaways Sand Member).
Alluvium / River Terrace Deposits - Potential for ground gas (methane and carbon dioxide)	Inhalation of contaminants in soils/dust/fibres. Lateral migration of ground gases and vapours.	Human Health -Construction Workers -End Users

Legend:	
	Topsoil / Turf
	River Terrace Deposits
	Alluvium
	Kellaways Sand Member
	Made Ground



The scaling of this drawing cannot be assured

Revision	Date	Dwn	Ckd
F	20.11.25	SM	FM
Graphics updated			

- Site Boundary
- Landowner Holding

Project

Sutton Benger

Drawing Title

Site Boundary Plan

Date

04.06.25

Scale

1:2,500 @A3

Drawn by

S.M.

Check by

F.M.

Project No

333102291

Drawing No

STN-GEN-SW-DR-MP-02F

Revision

0

20

40

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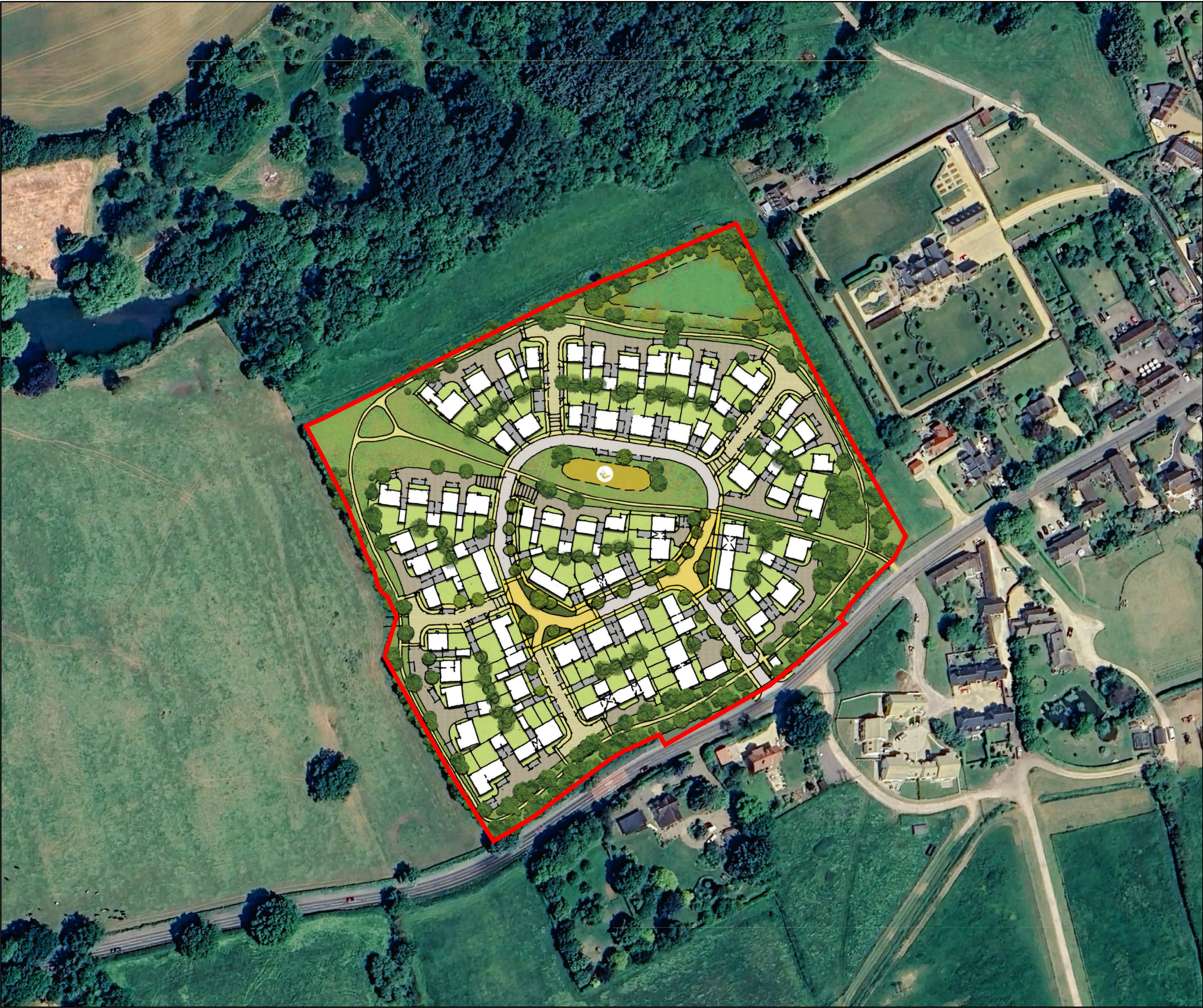
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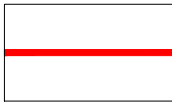
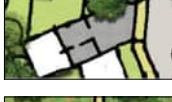
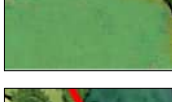
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C	Graphics Updated	20.11.25	SM FM

-  Site Boundary
-  Dwelling House
-  Gardens
-  Primary Vehicular Route
-  Formal Square
-  Shared Surface
-  Lane / Private Drive
-  Parking
-  Footpath
-  Play Space
-  Attenuation Basin
-  Proposed Tree Planting
-  Existing Tree Planting

Project
Sutton Benger



Drawing Title
Illustrative Site Layout

Date	Scale	Drawn by	Check by
31.07.25	1:1,250 @A2	M.D.	F.M./S.B.
Project No	Drawing No	Revision	
333102291	STN-GEN-SW-DR-MP-06	C	



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Appendix B: Photographic Report

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025

Photographic Report



Photograph 1 – Access to the southeast corner of Site obtained via gravel driveway off the B4069.



Photograph 2 – View northwest of gate providing access to the field comprising the north and west boundaries of Site.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 3 – Gate in the southeast gaining access to the central rectangular field.



Photograph 4 – View southwest across the central field.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 5 – View west across the central field, along the ‘retained view corridor’.



Photograph 6 – View north through the central field along the path of the overheads.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 7 – Manhole in the northeast corner, associated with foul sewer trending northeast to southwest across Site.



Photograph 8 – View east along the post and rail fence separating the two fields comprising Site.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 9 – Container in the northeast corner of Site currently used as a wood store.

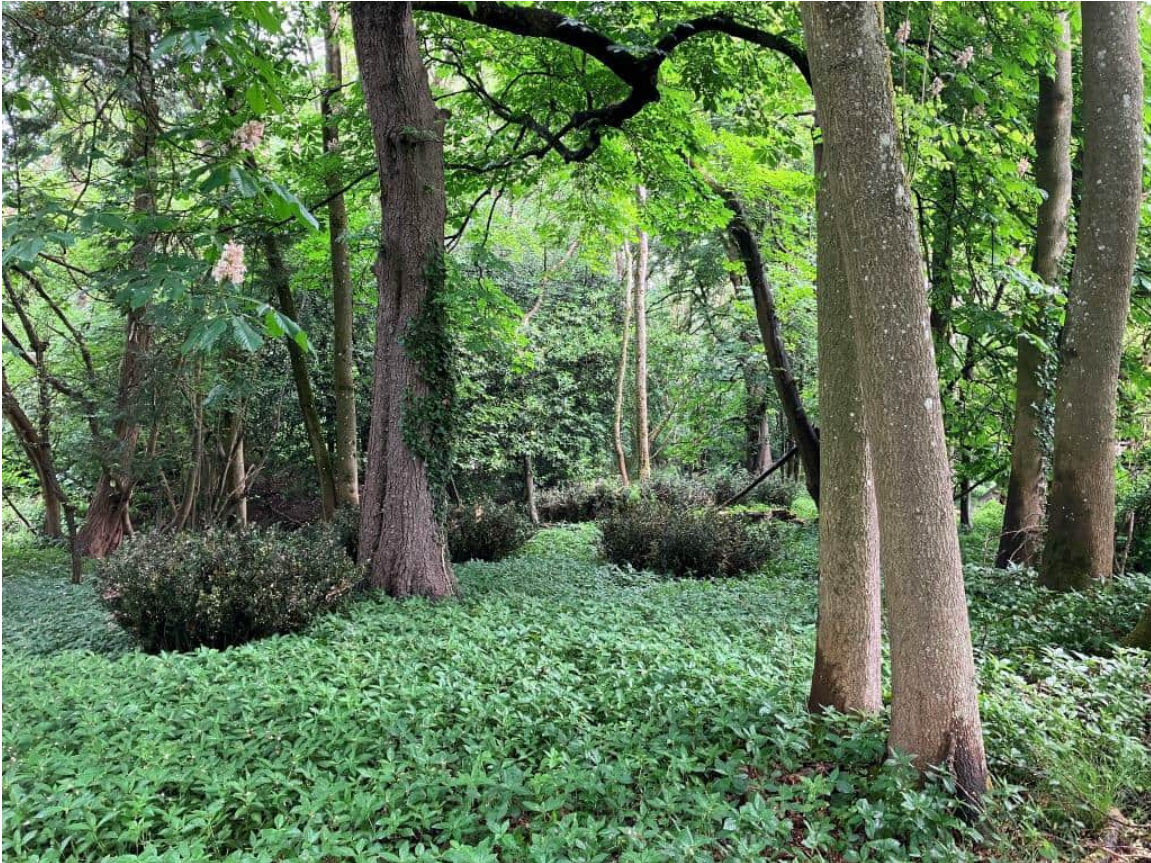


Photograph 10 – Disused swimming pool adjacent to the eastern boundary of Site.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 11 – View southwest along field in the north of Site and adjacent ancient woodland.



Photograph 12 – Ancient woodland immediately adjacent to the northern boundary of Site.



Photograph 13 – Watercourse and associated weir in the ancient woodland to the north of Site.



Photograph 14 – Sluice gate and weir associated with Draycot Lake to the northeast of Site.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 15 – Concrete overflow connecting Draycot Lake to the watercourse to the north of Site.



Photograph 16 – View north along the eastern boundary of Site comprising a hedgerow and electric fence.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 17 – View west along the southern boundary of Site, adjacent to which is the B4069.



Photograph 18 – Manhole in the southeast corner of Site associated with the foul sewer.

P25-317 – Land at Gate Farm, High Street, Sutton Benger - May 2025



Photograph 19 – Pole mounted electricity transformer associated with the overheads running through Site.

Appendix C: OS Historic Maps

Site Details:

P25-317 High Street, Sutton
Benger, Wiltshire

Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV_2500
Grid Ref: 393998, 178512

Map Name: County Series

Map date: 1886

Scale: 1:2,500

Printed at: 1:2,500



Surveyed 1886
Revised 1886
Edition N/A
Copyright N/A
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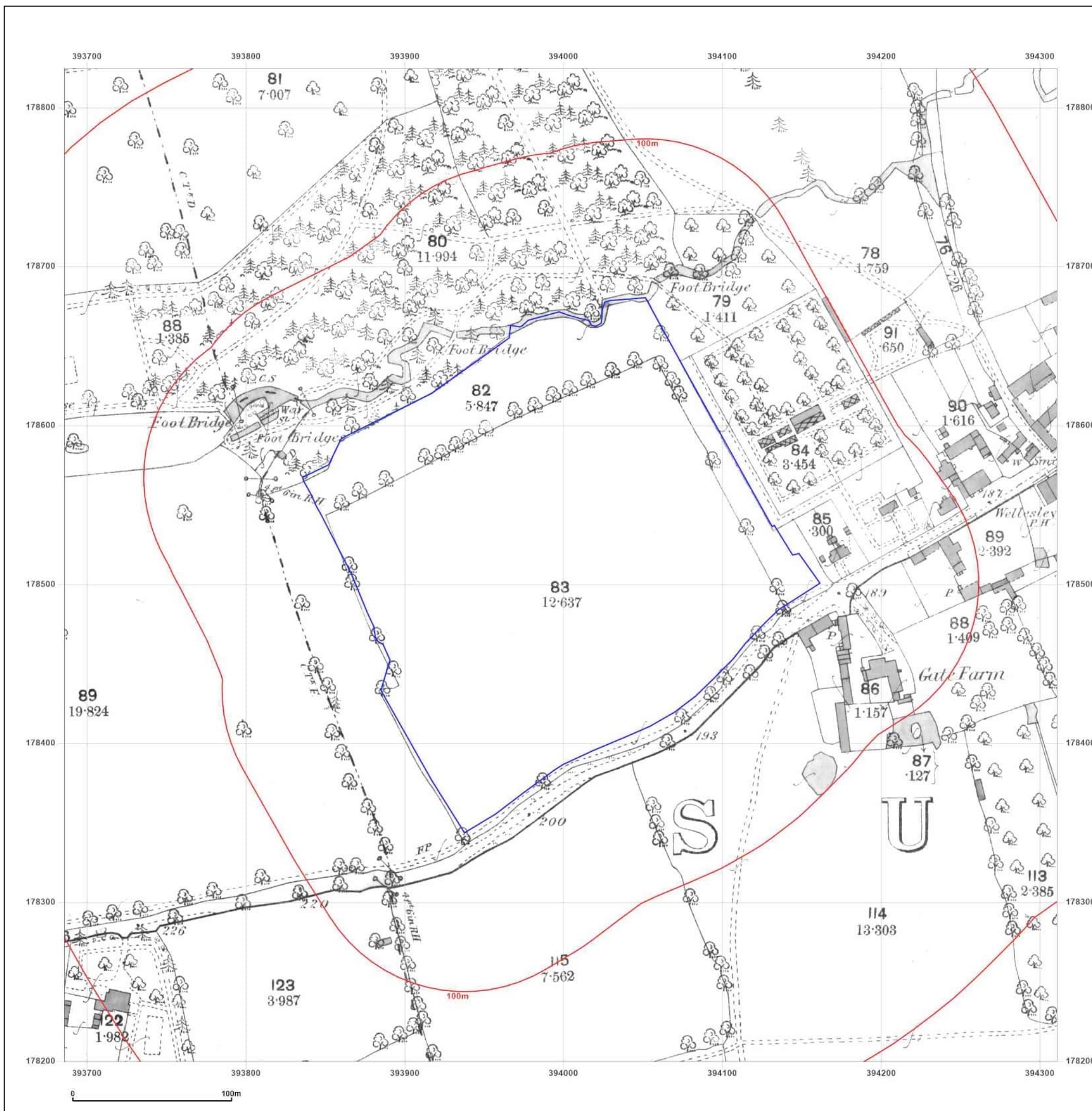


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Benger, Wiltshire

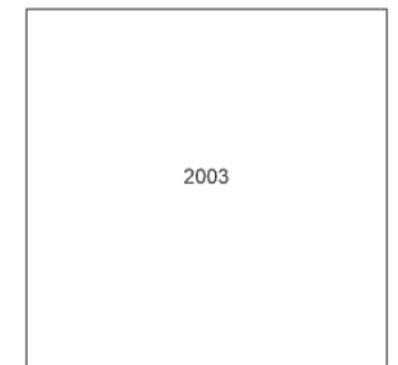
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Map Name: LandLine

Map date: 2003

Scale: 1:1,250

Printed at: 1:1,250



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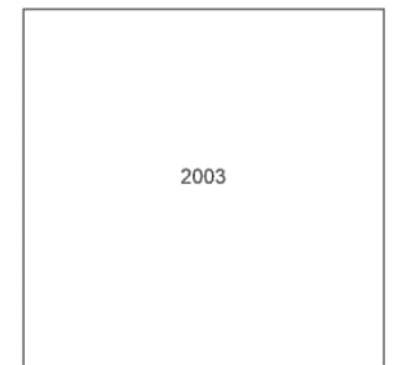
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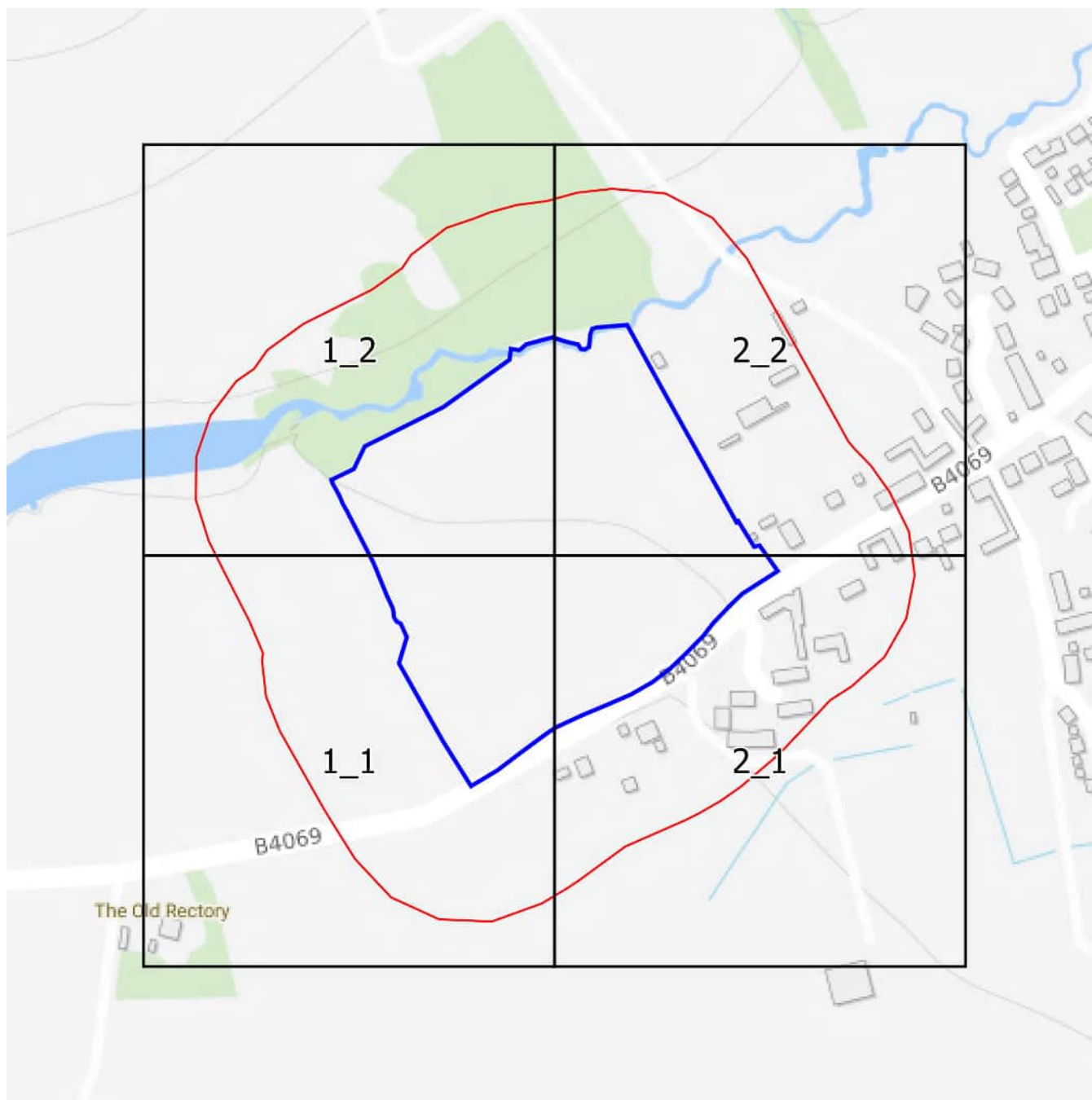
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Landline Scale Grid Index



Site Details:

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Benger, Wiltshire

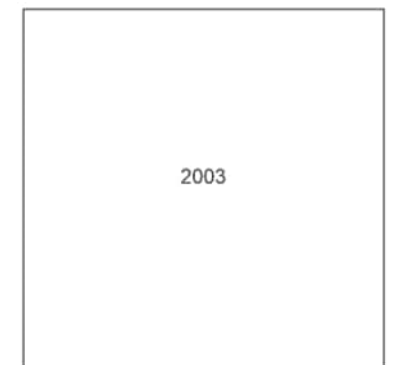
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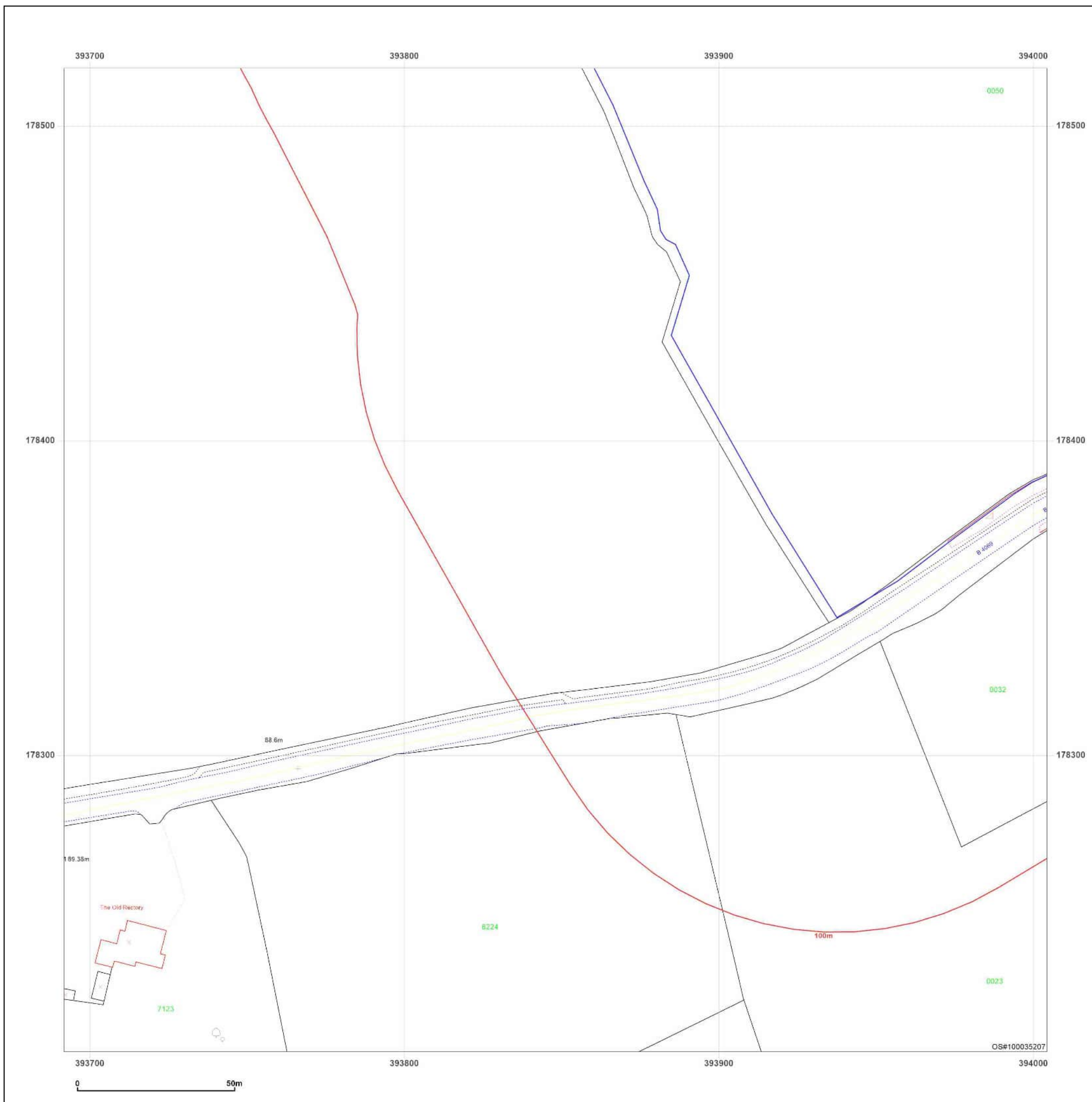


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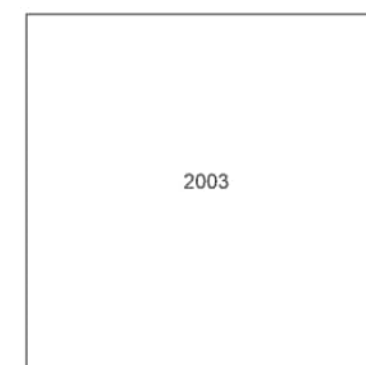
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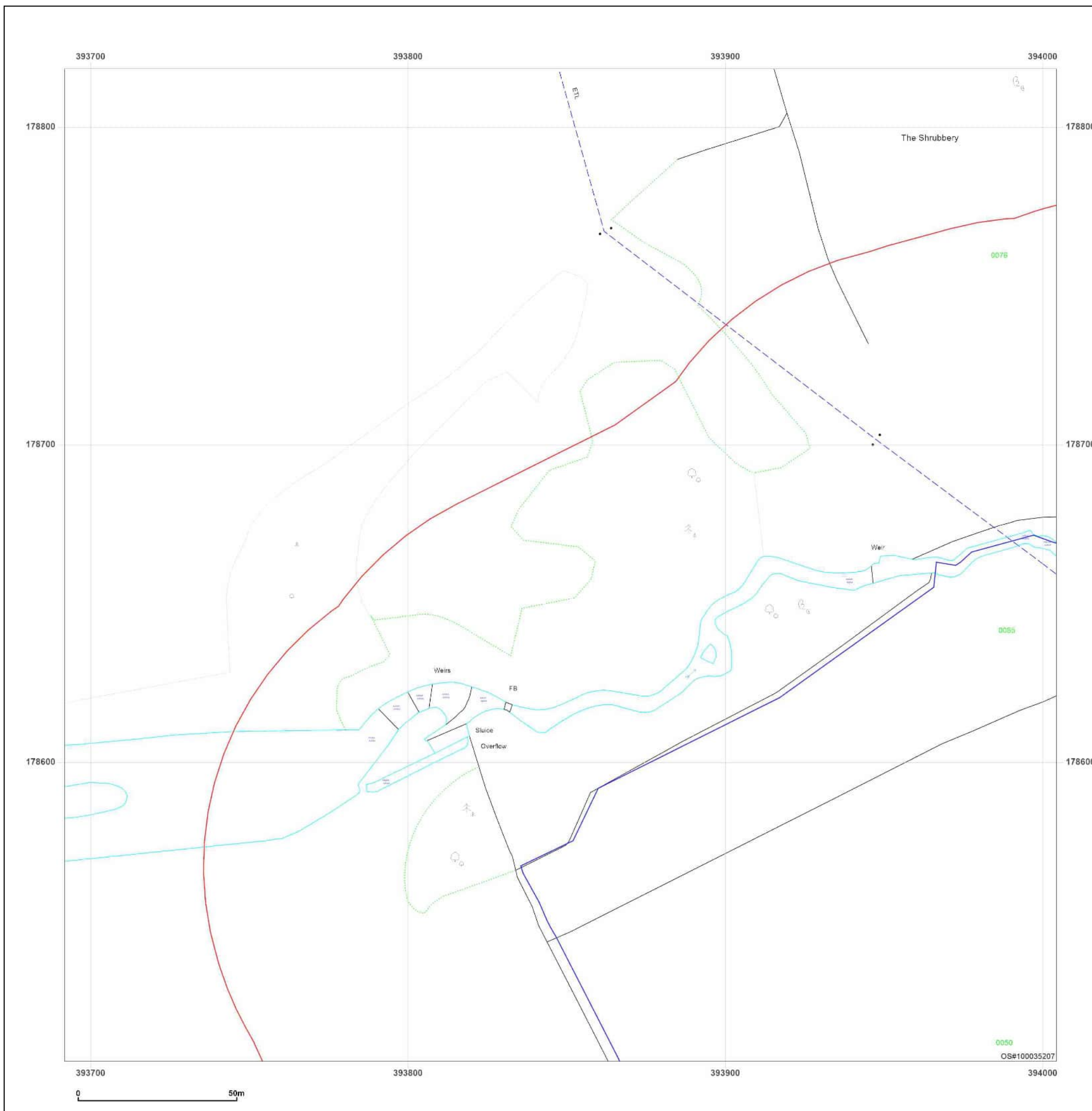


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Benger, Wiltshire

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Surveyed 1900
Revised 1900
Edition N/A
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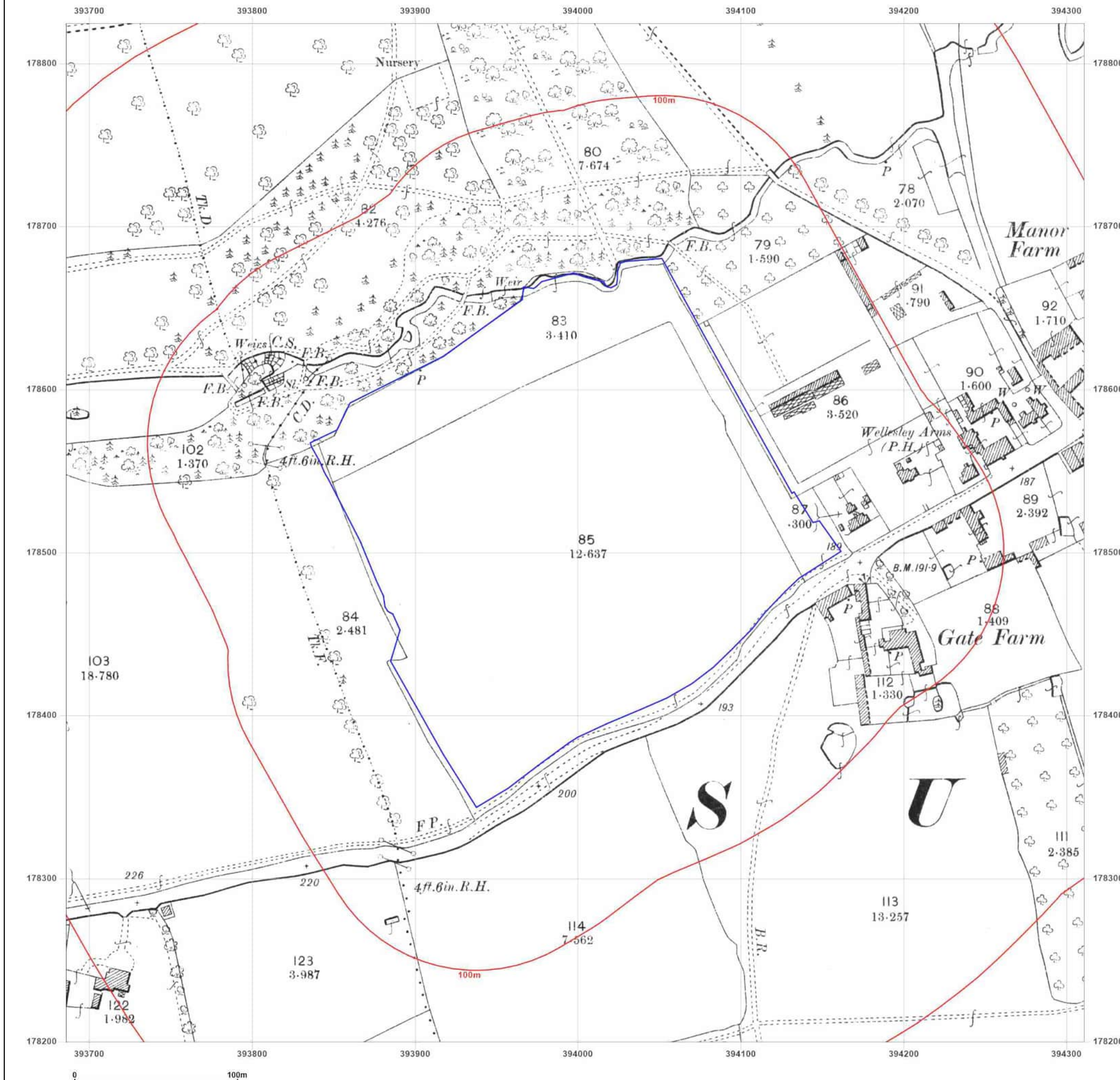


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Site Details:

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Benger, Wiltshire

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Map Name: County Series

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Surveyed 1923
Revised 1923
Edition N/A
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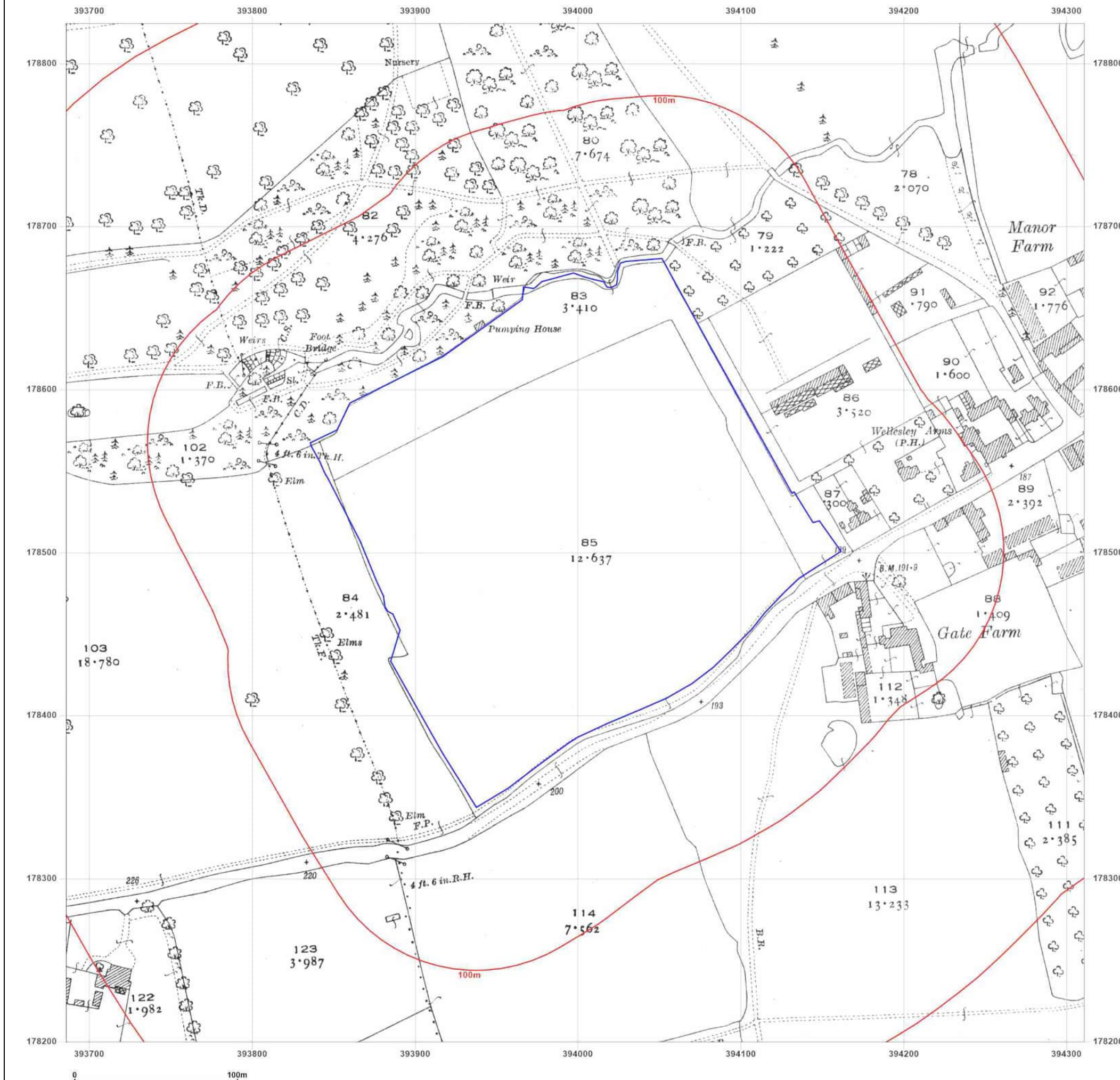


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Site Details:

P25-317 High Street, Sutton
Benger, Wiltshire

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Surveyed 1978
Revised 1978
Edition N/A
Copyright 1980
Levelled 1967

Surveyed 1978
Revised 1978
Edition N/A
Copyright 1979
Levelled 1967

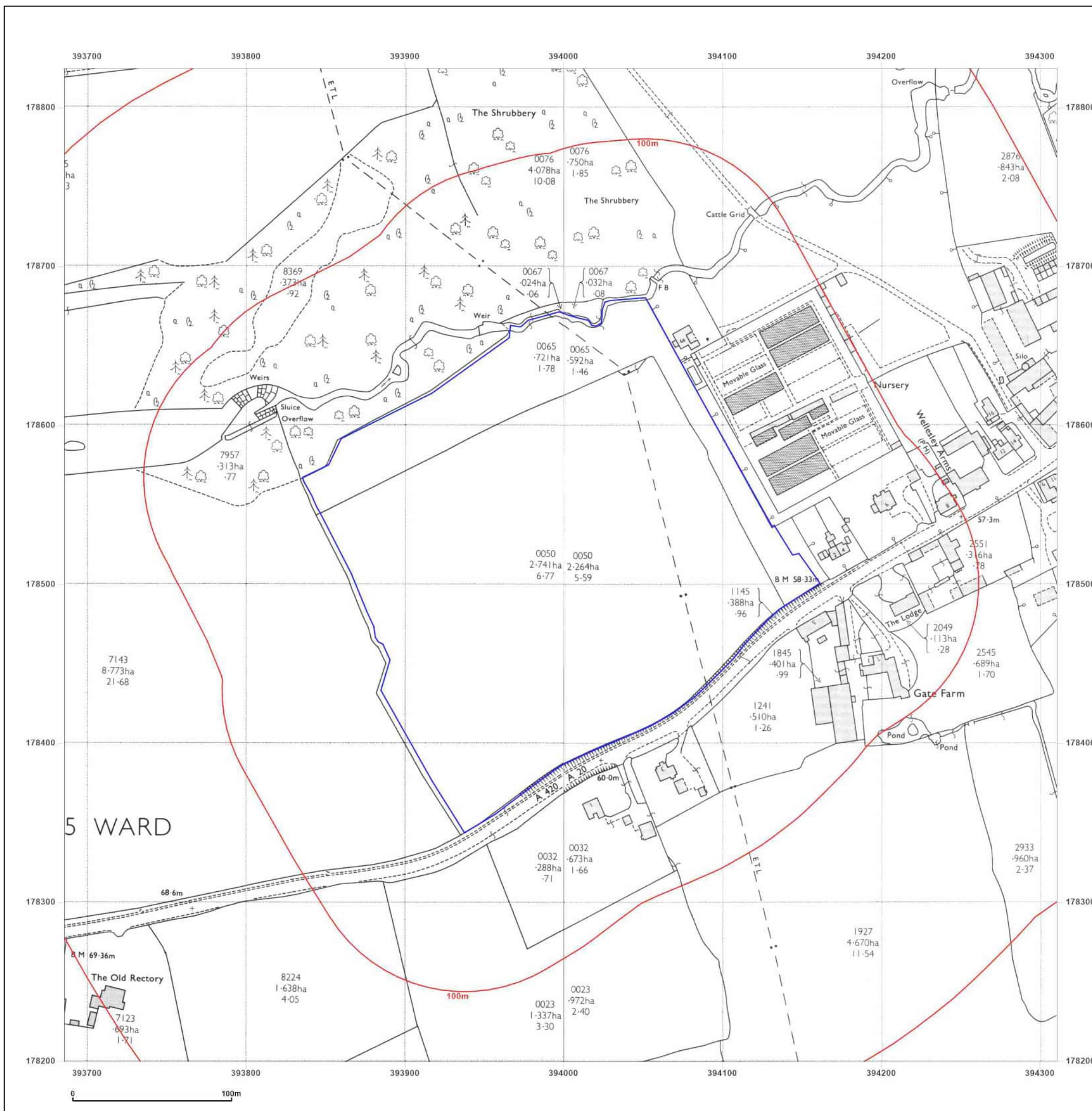


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Site Details:

P25-317 High Street, Sutton
Benger, Wiltshire

Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV_2500
Grid Ref: 393998, 178512

Map Name: National Grid

Map date: 1980-1983

Scale: 1:2,500

Printed at: 1:2,500



Surveyed N/A
Revised N/A
Edition N/A
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Levelled N/A

Surveyed 1967
Revised 1983
Edition N/A
Copyright 1983
Levelled 1967

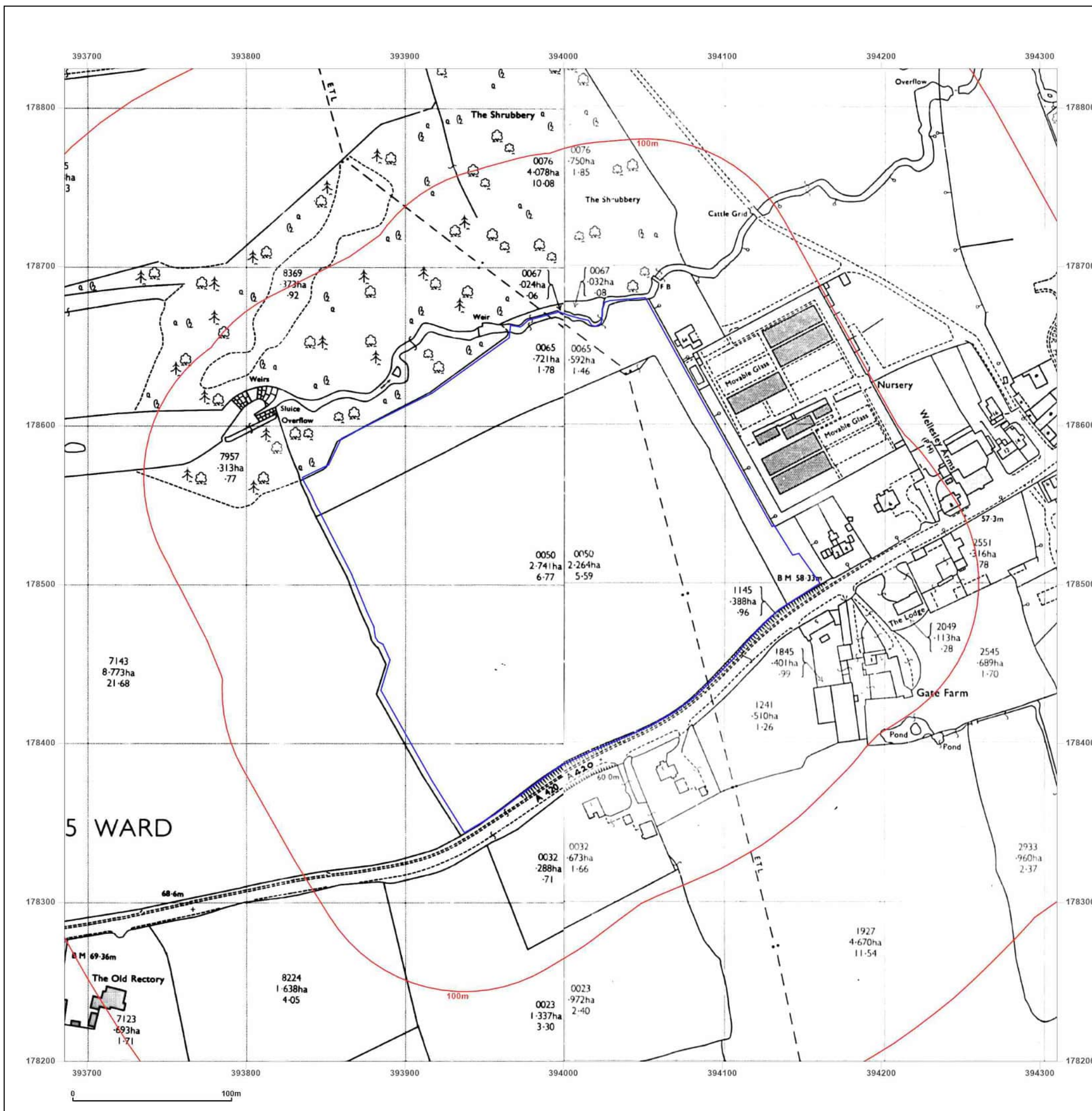


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Benger, Wiltshire

Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV_2500
Grid Ref: 393998, 178512

Map Name: National Grid

Map date: 1994

Scale: 1:2,500

Printed at: 1:2,500



Surveyed N/A
Revised N/A
Edition N/A
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Surveyed N/A
Revised N/A
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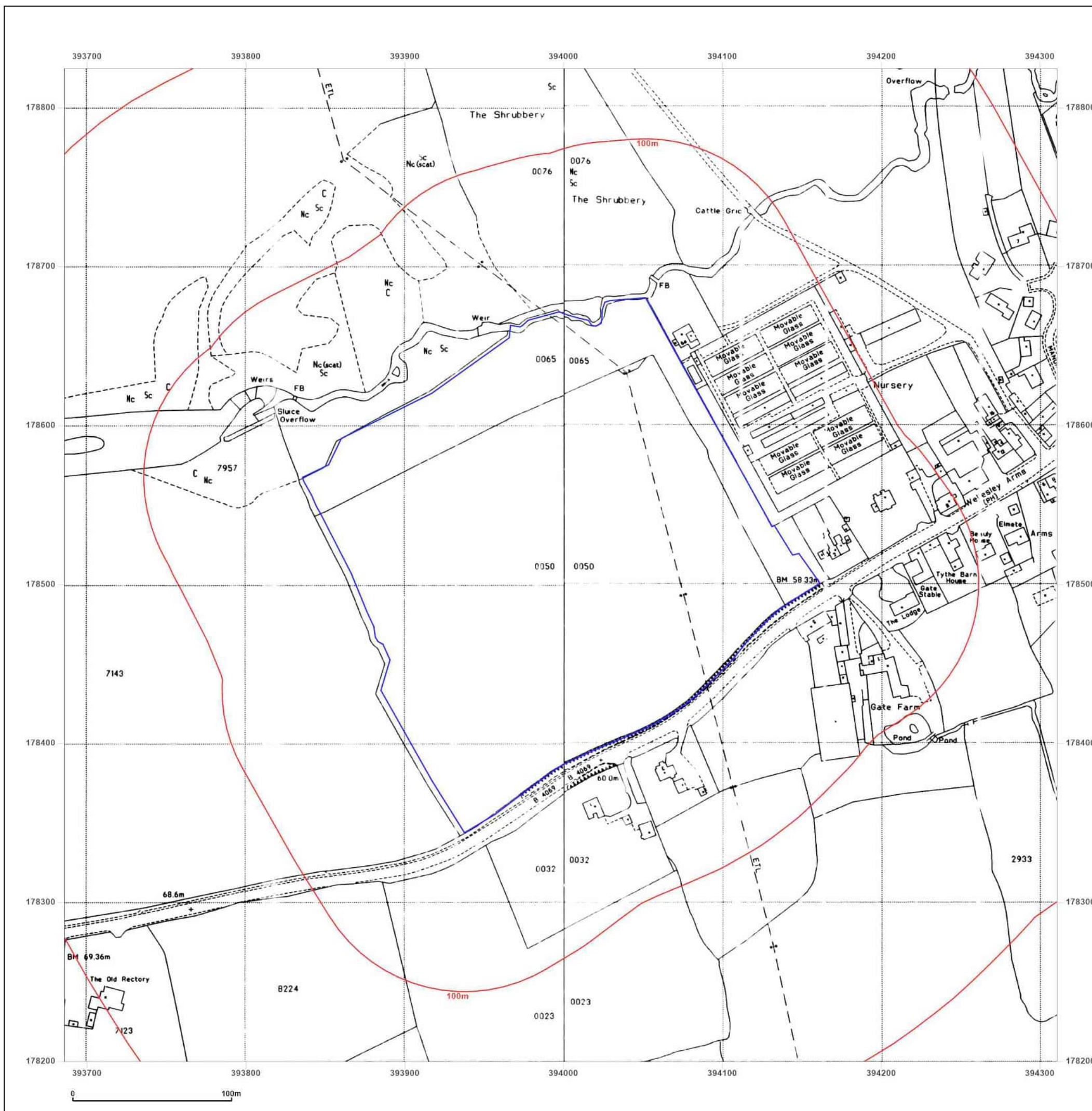


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: County Series

Map date: 1885

Scale: 1:10,560

Printed at: 1:10,560



Surveyed 1885
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Edition N/A
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Surveyed 1885
Revised 1885
Edition N/A
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Levelled N/A

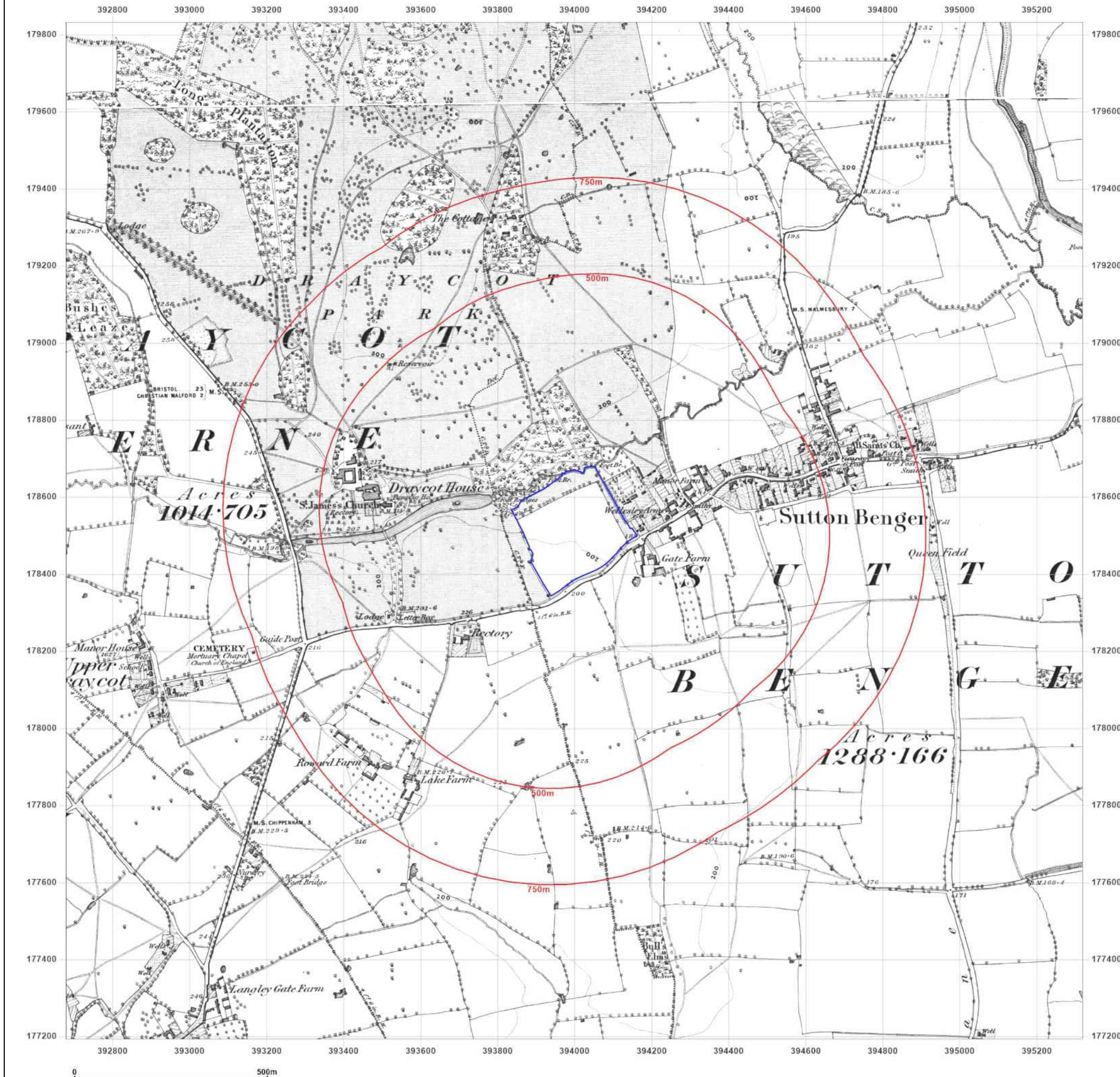


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: County Series

Map date: 1899

Scale: 1:10,560

Printed at: 1:10,560



Surveyed 1883
Revised 1899
Edition N/A
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Surveyed 1883
Revised 1899
Edition N/A
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Surveyed 1884
Revised 1899
Edition N/A
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Levelled N/A

Surveyed 1884
Revised 1899
Edition N/A
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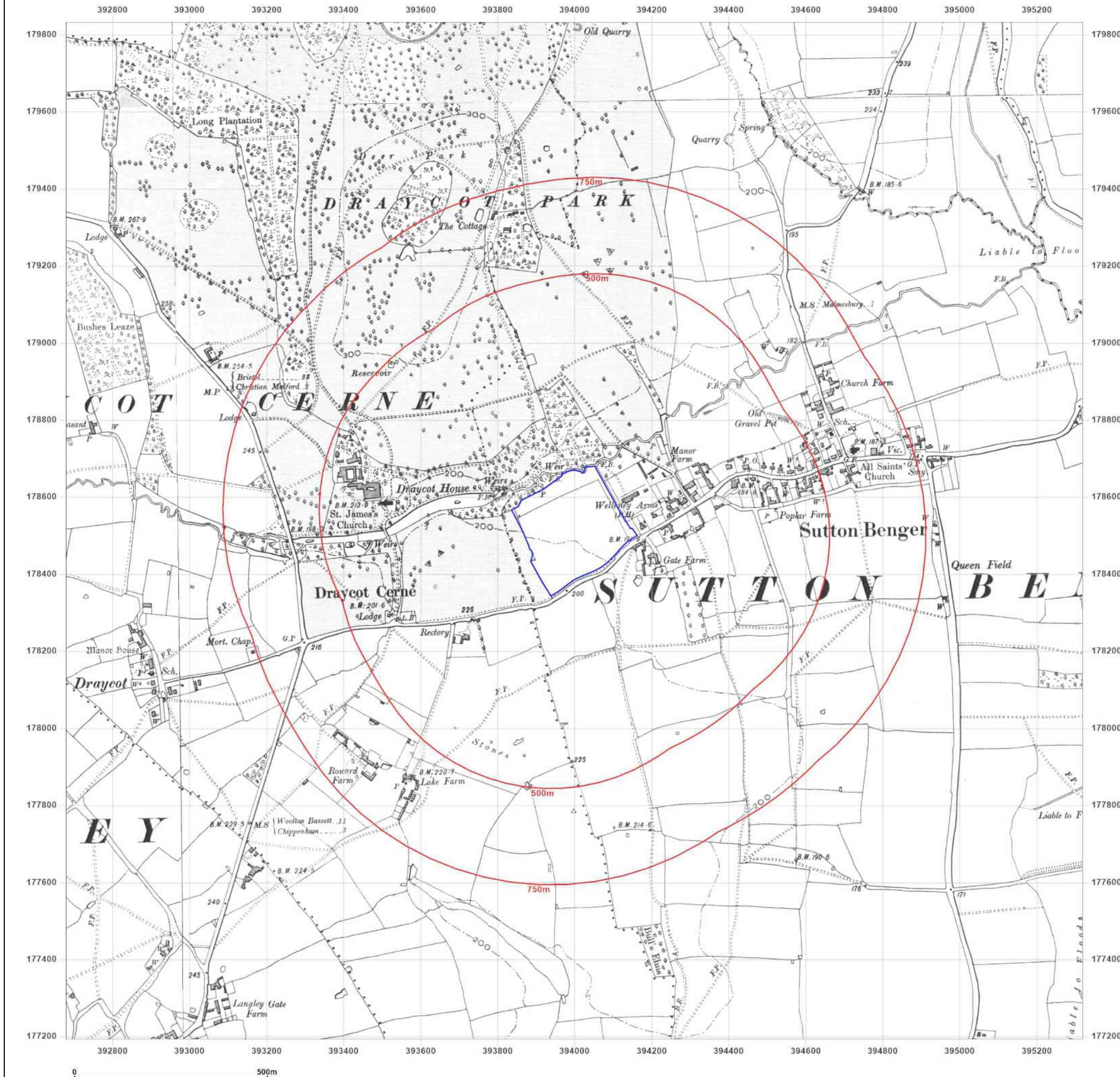


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Site Details:

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Benger, Wiltshire

Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: County Series

Map date: 1925

Scale: 1:10,560

Printed at: 1:10,560



Surveyed 1883
Revised 1925
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Surveyed 1883
Revised 1925
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Surveyed 1884
Revised 1925
Edition N/A
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Surveyed 1884
Revised 1925
Edition N/A
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Levelled N/A

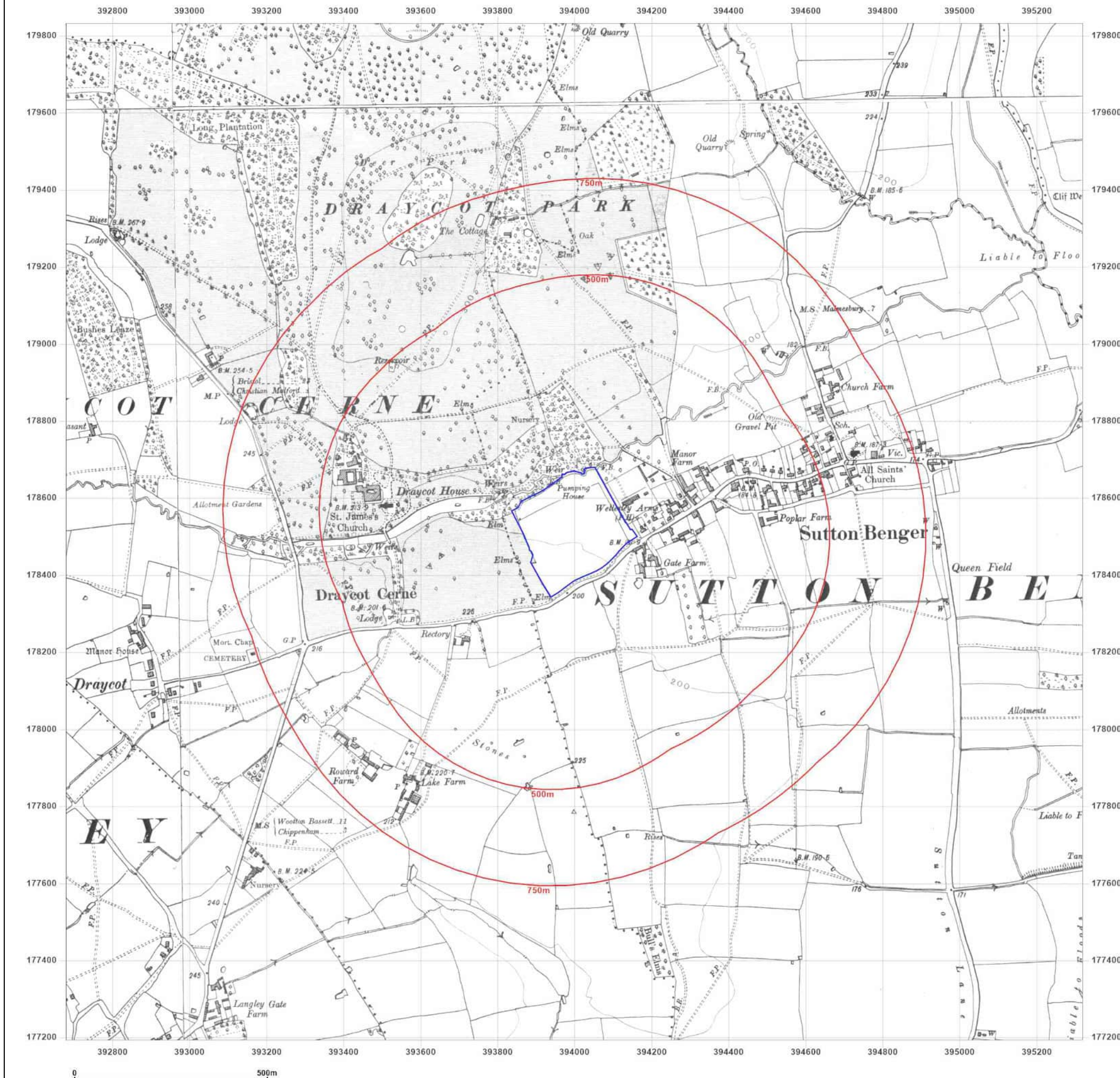


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: Provisional

Map date: 1956-1960

Scale: 1:10,560

Printed at: 1:10,560



Surveyed 1956
Revised 1956
Edition N/A
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Levelled N/A

Surveyed 1956
Revised 1956
Edition N/A
Copyright N/A
Levelled N/A

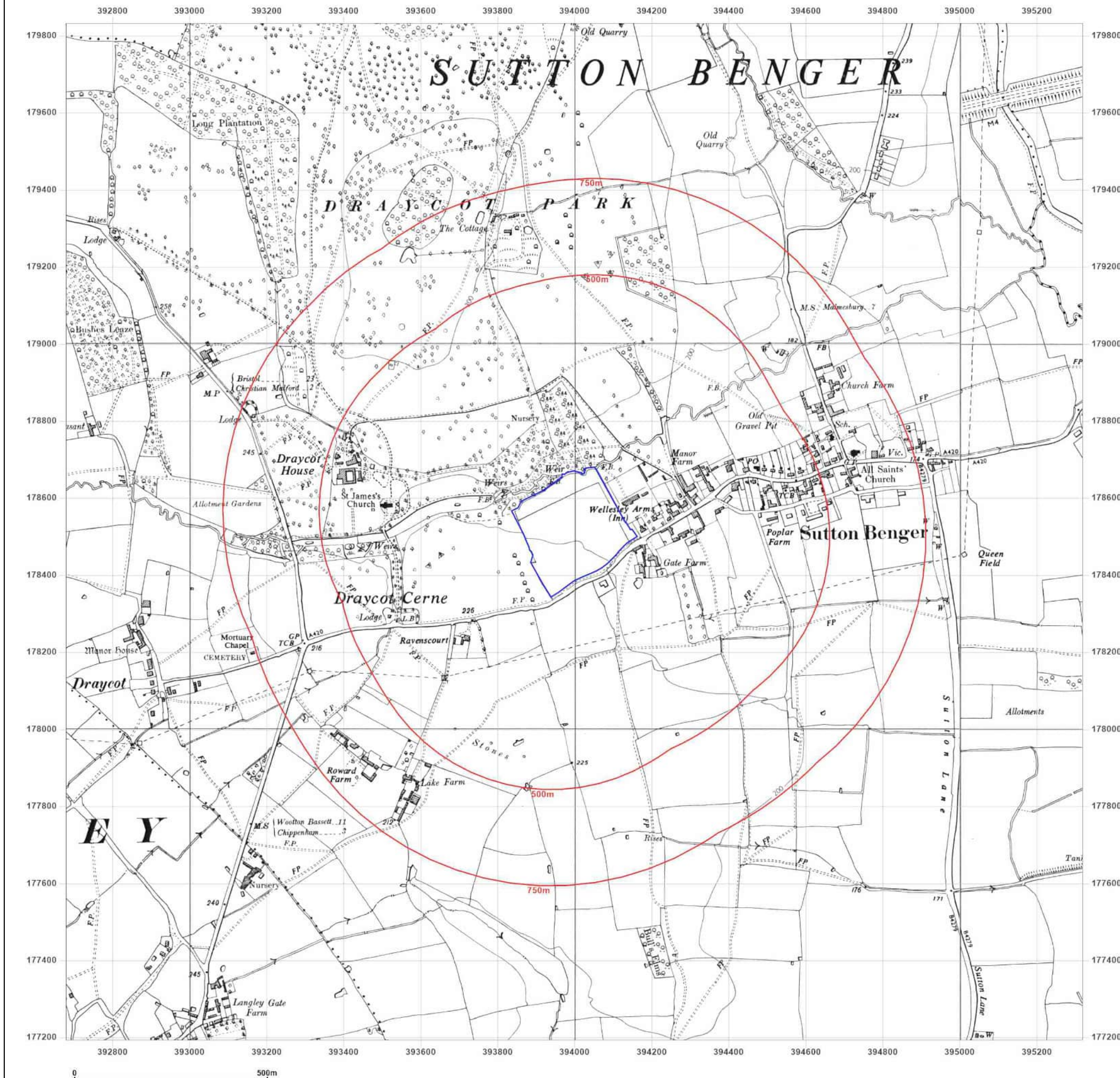


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: Provisional

Map date: 1974

Scale: 1:10,560

Printed at: 1:10,560



Surveyed N/A
Revised 1974
Edition N/A
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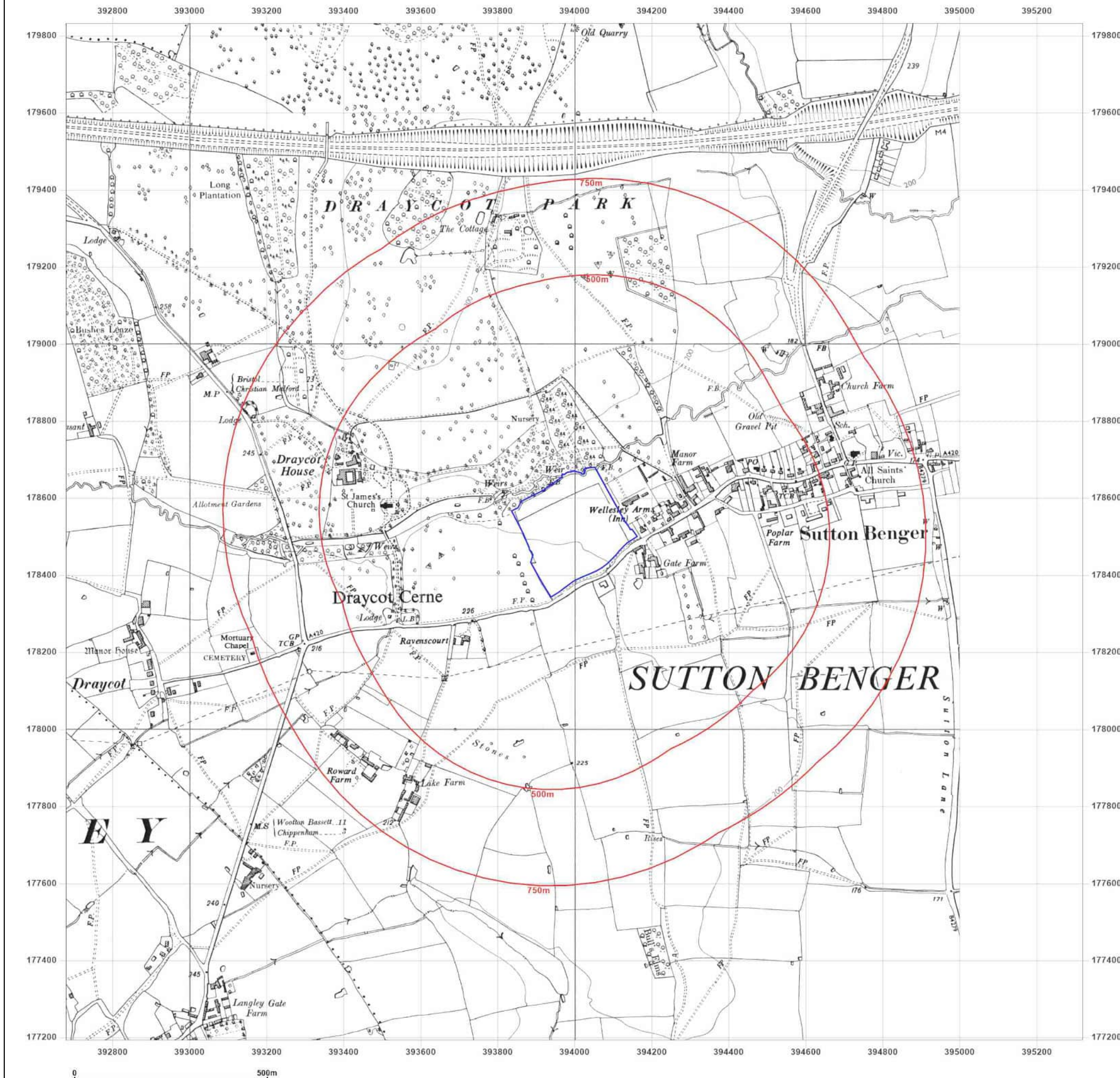


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: National Grid

Map date: 1981-1982

Scale: 1:10,000

Printed at: 1:10,000



Surveyed 1978
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Edition N/A
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Surveyed 1979
Revised 1981
Edition N/A
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Levelled N/A

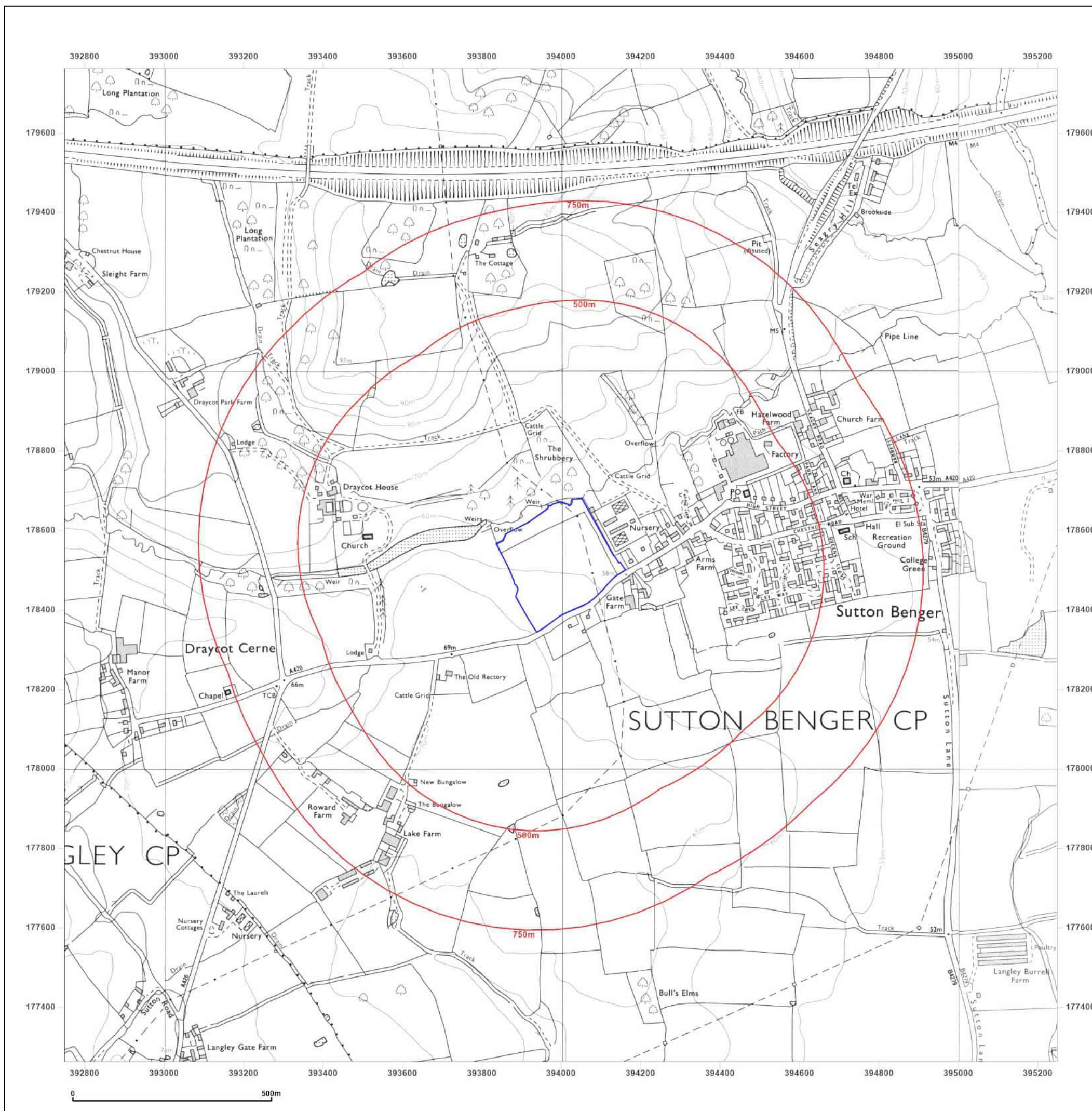


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Site Details:

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Client Ref: RLL 25-05-76
Report Ref: GS-HA4-F5F-KZH-VZV
Grid Ref: 393998, 178512

Map Name: National Grid

Map date: 2001

Scale: 1:10,000

Printed at: 1:10,000



2001



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