

To:	Andrew Thomas	From:	Ben Wilding
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Planning App Ref:	PL/2025/06615
Service Ref:	Drainage
Date:	22 January 2026

PROPOSAL

Full Planning Permission for Erection of building comprising 4No. flexible B8 storage and distribution and/or Class E(g) Commercial, Business and Service units and erection of building for mixed agricultural and equestrian workshop, storage and estate office and stables, all following demolition of existing B8 storage building and site remediation, together with associated parking, servicing, drainage, infrastructure, biodiversity net gain and landscaping and alterations to existing vehicular access

SITE LOCATION

Building at Seagry House, Off Henn Lane and Startley Road, Upper Seagry, Chippenham, SN15 5HD

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

- CP0110_Oak Hill Rep 23.09.25 ISSUED COMB[1][5]
- CP0110_Oak Hill Rep 28.10.25
- No5 copperfieldADVICE
- Phoenix Summary Note - Land Adjoining Oak Hill House, Upper Seagry
- FRA Addendum 3 (Dated January 2026) incl. appendices

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 application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

Following on from our previous comments, and additional comments submitted from third parties, the applicant has submitted a revised FRA and Drainage Strategy to provide more detail compared to what has been provided previously.

We note that there is dispute between the applicant and third-party comments including legal opinion submitted on the application of the Sequential and Exception Test at this location. The proposed site is bordered to the east by a road shown to be at risk of pluvial flooding based on the current EA RoFSW Maps; it is proposed to construct an access to the development from this road.

The applicant states that this road is served by an existing drainage system; the existing road is served by over-the-edge drainage into an existing ditch to the side of the road. Whilst the applicant is correct that drainage systems are often not fully represented within the EA's NaFRA2 dataset, the topographical ditch may still be represented. Without additional modelling to fully represent the ditch, we cannot draw alternative conclusions on the pluvial flood risk to the adjacent road and therefore must rely currently on the EA's RoFSW maps. Due to the construction of the site access on to the road, this may trigger a requirement for Sequential / Exception Test to be undertaken (this is for the LPA to determine).

The proposed drainage strategy seeks to split the site into two sub-catchments – based on the existing topography this will replicate the existing arrangement ensuring that catchment transfer does not occur.

The proposal is for the western catchment to be drained to an existing surface water sewer, and the eastern catchment to be drained to the ordinary watercourse to the west of the site. Both sub-catchments are stated to provide a min 30% betterment over existing with long term storage being provided through limiting the higher return period events to the Q2 discharge rate.

We note that the applicant has revised their Hydraulic Model Calculations to provide additional flow restriction, and to use a Cv value of 1 within the model. We do note however that the following will need to be addressed as part of detailed design:

- i. The western catchment includes an offline detention basin applied to node 110. This is currently modelled as online storage rather than the offline storage shown within the layout. The detention basin will need to be modelled as offline within the Causeway Flow model.
- ii. Hydraulic models have not been provided for the eastern catchment – this will need to be provided to demonstrate full compliance.

- iii. The applicant is proposing flow control to be provided through small diameter orifice plates (31mm for the western catchment and 23mm for the eastern catchment). The applicant needs to carry out a blockage risk assessment to demonstrate that these are appropriate. Whilst the SuDS Manual mentions that a 20mm orifice can be acceptable where there is a low risk of blockage, this is generally constrained to closed systems where debris ingress is not possible.
- iv. As both outfalls are to existing drainage systems, the applicant should also complete sensitivity analysis to demonstrate that flooding in the network will not occur during surcharged outfall conditions.

We note that interception storage for the western catchment will be provided through rainwater harvesting (with full details still in abeyance).

Given that the detention basin on the western catchment is offline it will not have the same water quality benefits as an online basin. We would require the applicant to submit calculations using Simple Index Method, or similar, to demonstrate that sufficient water quality is achieved (in line with National SuDS Standard 4).

With regards the eastern catchment we note that there are currently no formal features to prevent exceedance flows discharging to the highway – the applicant should provide additional definition as to how exceedance onto the highway will be prevented. We also note that the current system relies on a permeable subbase being overlayed with an impermeable bituminous surface, which is reliant on the performance of a gravel filter drain at the edge. We do not believe this design will be effective in distributing flows through the subbase as expected and would expect the applicant instead to adopt a permeable paving system including a permeable surface to promote better management of runoff.

With regards the western catchment, the current connection to private surface water sewer is stated to be within the applicant's land but is shown to be outside of the application red line boundary. We would expect the applicant to confirm the location of the connection point at this stage, and either demonstrate this is within their own land ownership or provide agreement from the relevant landowner and asset owner.

We had previously requested that a plan for safe access / egress from the site during design flood conditions (as per PPG) would need to be provided. This will still need to be provided (we do note that the applicant states that alternative access can be achieved).

RECOMMENDATION

Subject to the LPA confirming the requirement for sequential / exception test for this site in line with the comments above, we would recommend the additional information on this application could be secured via condition.

We would suggest the following condition to be applied:

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.

Specific points we would need to see addressed are detailed in the commentary above.

INFORMATIVES

Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

Works within 8m of an Ordinary Watercourse will require Land Drainage Consent from the LLFA.

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 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.