

To:	Isobella Wise	From:	Drainage Team
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Planning App Ref:	PL/2026/00269
Service Ref:	Drainage
Date:	17/02/2026

PROPOSAL

Conversion of Cart Shed, to dwelling, erection of a new garage and the demolition of former dairy building.

SITE LOCATION

Showell Farm, Showell, Chippenham, SN15 2NU

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	X
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form Redacted
- Covering letter-design and access statement redacted
- Layout Plan Parking and Access
- Location and Block 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

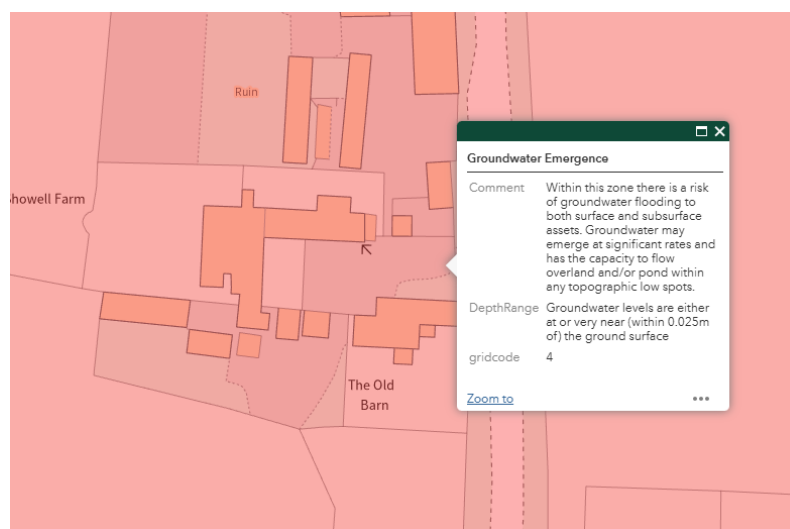
The application has not been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the documents submitted and we do not take any responsibility for incorrect data or interpretation made by the authors.

The proposal seeks to convert the curtilage-listed Cart Shed into a two-bedroom dwelling, demolish the deteriorated former dairy building, and construct a new timber-framed open-fronted garage. However, despite the Covering Letter and Design and Access Statement stating under the Flooding and Drainage section that the site is within Flood Zone 1 and that surface water will be managed via existing soakaways, no technical drainage evidence has been submitted.

In particular, the application lacks essential supporting information such as:

- A detailed soakaway design
- Infiltration (percolation) testing in accordance with BRE365
- A proposed drainage layout plan
- Evidence regarding the condition, location, and capacity of any existing soakaways

In addition, SFRA mapping indicates that the site access road is at risk of surface water flooding. Combined with this, the site also has a high risk of groundwater flooding. This raises significant concerns about the viability of using soakaways as the primary drainage solution and the overall suitability of the site for residential conversion without a robust and evidence-based drainage strategy.



Groundwater Flooding

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

- The applicant should provide a drainage plan showing all the existing and proposed drainage features, including levels, gradients, pipe diameters, invert levels, the position of soakaways or attenuation features
- The applicant should provide full details of the existing drainage arrangements, including the condition and capacity of any soakaways, alongside a proposed drainage system, an explanation of how the design will ensure that flood risk is not increased elsewhere, and confirmation that the drainage proposals comply with Building Regulations Part H and National SuDS standards.
- The site is located in an area susceptible to groundwater flooding. Therefore, in line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant is required to carry out a site-specific groundwater flood risk assessment that includes:
 1. Groundwater level monitoring (taking into account seasonal variations).
 2. The interaction between different sources of flooding.
 3. How groundwater will impact on the proposed drainage system.
 4. The interaction between groundwater, groundwater recharge and aquifers.
- Evidence that Soil percolation tests/soakage tests have been undertaken in accordance with Building Regulations / BRE 365, and confirmation of infiltration rates. (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14-3.15)
- Evidence or calculations to demonstrate that the soakaway has been designed for:
 - 1 in 100yr + cc flows
 - Half drain time <24hrs
 - Highest groundwater level at least 1m from base of the soakaway
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.

TABLE 25.2 Suggested factors of safety, F, for use in hydraulic design of infiltration systems (designed using Bettess (1996). Note: not relevant for BRE method)			
Size of area to be drained	Consequences of failure		
	No damage or inconvenience	Minor damage to external areas or inconvenience (eg surface water on car parking)	Damage to buildings or structures, or major inconvenience (eg flooding of roads)
< 100 m ²	1.5	2	10
100–1000 m ²	1.5	3	10
> 1000 m ²	1.5	5	10

(National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14-3.17).

Once the points above have been resolved by the applicant, the following information can be resolved via condition:

- The applicant must provide cross-section drawings for all proposed surface water features, showing levels, freeboard allowances, and depths, to demonstrate that the drainage system can function hydraulically and that adequate clearances are maintained.
- The applicant must supply an exceedance flow routing plan illustrating how surface water will safely flow across the site during storms that exceed system capacity (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))

- The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- All new drainage will need to comply fully with Building Regulations Part H. (they should engage with the building control department in order to ensure this).
- 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.
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.

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.