

To:	Lucie Turner	From:	Drainage Team
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Planning App Ref:	PL/2026/00787
Service Ref:	Drainage
Date:	27/02/2026

PROPOSAL

Conversion of The Old Granary to dwelling, including a glazed link to existing building 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	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Design and Access Statement
- Flood Risk Assessment
- 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.

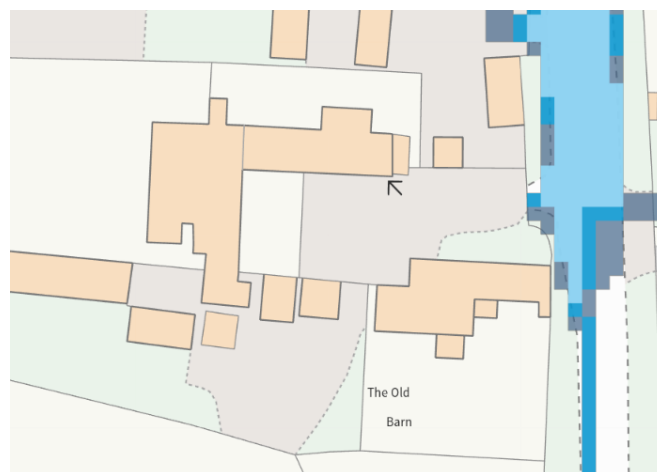
Assessment

The application has 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.

The proposal seeks to convert the Old Granary into a dwelling with a small, glazed link, which will introduce a modest amount of new impermeable area. The Flood Risk Assessment (FRA) notes, however, that a larger dairy building will be demolished and replaced with permeable parking, potentially resulting in an overall reduction in impermeable surfaces.

Despite this, the site is identified as having a high risk of groundwater flooding. The applicant proposes to utilise the existing soakaway system to manage surface-water runoff from the development, but further details are required. This includes evidence of infiltration testing, a full drainage layout, and confirmation of soakaway sizing.

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.



Surface Water Flooding (Source SFRA)

RECOMMENDATION

No Objection Subject to Condition

- No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.**

In order to discharge the above drainage, condition the following additional information must be provided:

- A full drainage layout drawing must be provided to show how surface water will be collected, routed, and discharged, including the location of the existing soakaway.
- The applicant should provide full details of the existing drainage arrangements, including the condition and capacity of any soakaways.
- Further details are required regarding the design and performance of the proposed permeable paving, including how surface water will be managed within the system and its integration with the wider drainage strategy; in addition, BRE365 infiltration testing and seasonal groundwater monitoring are needed to confirm that infiltration drainage and the use of the existing soakaways are viable given the site's location within a groundwater emergence zone.
- 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).

- An exceedance flow routing plan is required to demonstrate where water will flow if the drainage system or soakaway becomes overwhelmed or overflows, and to ensure this does not increase flood risk to the access road.
- 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 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 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.
- 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 sets 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.