

To:	Andrew Thomas	From:	Ben Wilding
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Planning App Ref:	PL/2025/06615
Service Ref:	Drainage
Date:	25 February 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
- Drainage Strategy Addendum 3 v2 (Dated February 2026) including appendices
- Catchment Assessment
- Surcharged Outfall Results

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 (labelled as Startley Road within the submission), shown to be at risk of pluvial flooding based on the current EA RoFSW (2025) 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.

The 2025 RoFSW maps show that the road, and the applicant's site (labelled as Startley Road in the applicant's submission) shows the anticipated pluvial flooding to be in the 0.2m depth band, at "low" risk likelihood (i.e. the area has less than a 1% (1 in 100) annual chance of surface water flooding, but greater than or equal to 0.1% (1 in 1000)). The RoFSW maps show that there is an area of pluvial flood risk to the east of Startley road corresponding with a flood depth between 0.6m – 0.9m, and of varying likelihood (up to high risk). It should be noted that this is not within the applicants redline boundary.

It is important to note that the applicant proposes an alternative emergency access route in the event of flooding on Startley Road via Henn Lane. As such we can be confident that safe access and egress from the site can be achieved in the design storm as per PPG. A flood emergency plan, formalising this approach, could be secured via planning conditions.

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 discharge

rates, with long term storage being provided through limiting the higher return period events to the Q2 discharge rate. This complies with the guidance in the CIRIA SuDS Manual and the National SuDS Standards.

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.

Following previous comments, the applicant has amended the drainage strategy to utilise an online detention basin feature (rather than an offline feature previously shown). This therefore addresses our previous comment (i) from 22 January 2026, as well as our comment with regards to water quality in compliance with National SuDS Standard 4. We are satisfied that no further action is needed here.

We had previously incorrectly stated that hydraulic models were not provided for the eastern catchment; the applicant has provided additional clarity in the latest submission. This closes our previous comment (ii) from our 22 January response.

In response to our 22 January comment (iii), the applicant has provided clarity on the use of a proprietary flow control product which helps manage the blockage risk of the small diameter orifice proposed, subject to the drainage system being adequately maintained.

We note that interception storage for the western catchment will be provided through rainwater harvesting (with full details still in abeyance). It is acceptable for these additional details to be provided under condition as part of detailed design, as this will only help to reduce discharge rates from the site further.

With regards the eastern catchment we note that in the present scenario there are no formal features to prevent exceedance flows discharging to the highway. In the latest design iteration, the applicant has included an additional bull-nose kerb to help contain overland exceedance flows on site and prevent an increase in runoff to the highway. This is acceptable.

With regards the western catchment, the applicant has demonstrated that the connection to the private surface water sewer is within the applicant's blue line boundary.

The applicant has completed a sensitivity analysis considering surcharged outfall conditions. This shows that with 490mm depth of surcharged outfall, the proposed networks will still not exhibit flooding on site in the 1 in 30yr event. At 500mm depth of surcharge on the outfall, some flooding is exhibited in the model – this is less than 1m³ total and could be argued to be insignificant with regards the inherent accuracy of the hydraulic model.

It is noted that even 490mm depth of surcharge in the receiving network is unlikely to occur, and therefore this is a suitably conservative sensitivity check. We would have no further comments on this matter.

The proposed drainage will be solely in private ownership and will be the responsibility of the landowner for the lifetime of the development. As per the requirements of the Land Drainage Act the Land Owner will need to ensure that sufficient maintenance is undertaken to ensure that flood risk is not increased elsewhere. The currently submitted proposals align with the CIRIA SuDS Manual. We note that the proposed small diameter orifice chamber will need more regular inspection, and would recommend this is inspected (with any required maintenance completed) on a monthly basis, and following significant (named) storm events.

RECOMMENDATION

No objection subject to condition

Prior to commencement of construction, we would expect the applicant to provide:

1. Detailed design and hydraulic performance of the proposed rainwater harvesting system (including details of proposed tanks, volumes and by-pass arrangements).

2. A flood emergency plan detailing the safe access / egress routes if Startley Road access was to become flooded

On completion of construction we would request the following is provided:

No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer shall submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:

- i. *As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.*
- ii. *As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.*
- iii. *All as-built SuDS and watercourse/ditch drawings shall be provided in:*
 - a. *AutoCAD (DWG) format, fully georeferenced to OS National Grid; and*
 - b. *PDF format for record purposes.*
- iv. *A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.*
- v. *An updated SuDS Maintenance Plan reflecting the final as-built arrangement.*

The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system.

Reason:

To ensure the constructed drainage system and watercourse/ditch modifications accord with the approved design, to maintain accurate LLFA drainage records, and to ensure the development does not increase flood risk on- or off-site, in accordance with the NPPF and Wiltshire Council SuDS guidance.

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 outs 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.

Ben Wilding
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