

To:	Selina (Nina) Parker-Miles	From:	Drainage Team
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Planning App Ref:	PL/2026/00997
Service Ref:	Drainage
Date:	20/03/2026

PROPOSAL

Full planning permission for proposed rebuilding and refurbishment of the existing Dairy Barn (no extension) and change of use into a 2-bedroom holiday let.

SITE LOCATION

Upper Studley Farm, Swindon Road, Royal Wootton Bassett, Swindon, SN4 8ET

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 Redacted
- Design and Access Statement Dairy Barn
- Existing East & North Elevations Dairy Barn
- Existing Floor Plans Dairy Barn
- Existing Roof Plan Dairy Barn
- Existing Site Plan Dairy Barn
- Existing South Elevation Dairy Barn
- Existing Floor Plans Dairy Barn
- Existing West Elevation Dairy Barn
- Flood map
- Location Plan Dairy Barn
- Proposed Bike and Bin Stores Dairy Barn
- Proposed Elevations Dairy Barn
- Proposed FF Plan Dairy Barn
- Proposed GF Plan Dairy Barn
- Proposed Roof Plan Dairy Barn

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.

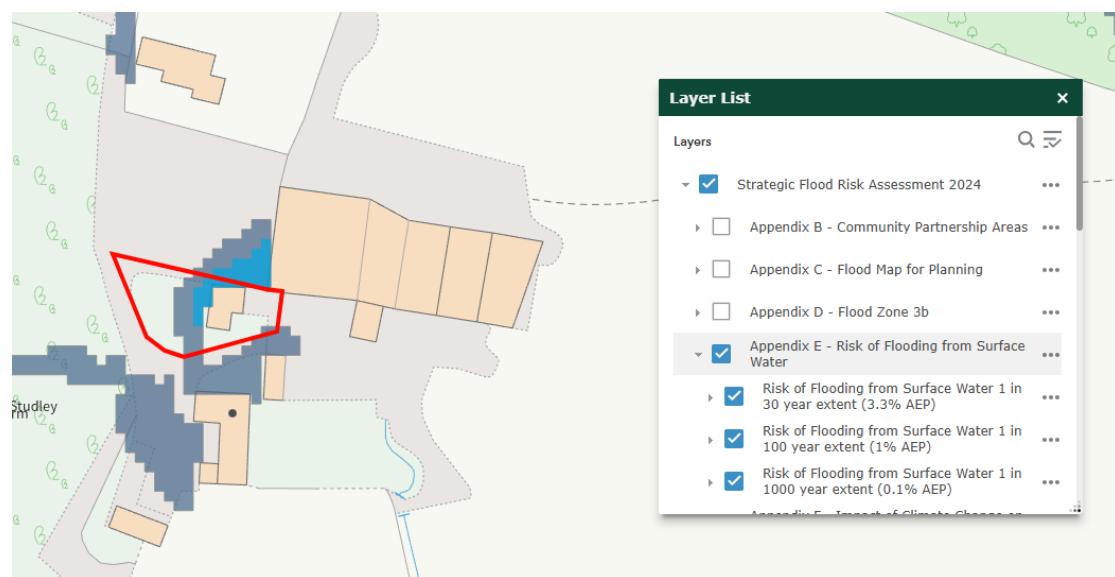
Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

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 FRA and we do not take any responsibility for incorrect data or interpretation made by the authors. The developer, or agent working on their behalf, retains the responsibility for the checking of the design, calculations and details contained in additional submitted information.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and has a low level of risk from fluvial flooding.

The surface water flood maps indicate areas of surface water flooding across the middle of the site.



The site has a low level of risk from ground water flooding.

The proposal is rebuilding and refurbishment of the existing dairy barn (no extension) and change of use into a 2-bedroom holiday let.

Two allocated parking spaces are proposed, and it has been confirmed that these will have permeable surfacing. However, it is not clear whether the courtyard surrounding the property is also intended to be permeably surfaced, or whether it will result in an increase in impermeable area. If any increase in impermeable surface is proposed, the applicant must demonstrate that the additional surface water runoff will be appropriately managed to ensure there is no increase in flood risk to the property - particularly as the site's vulnerability will increase with its change to residential use. The applicant should consider how the courtyard will be drained, and whether the proposed kerb edge could interrupt existing natural flow routes across or through the site. They should also consider measures to protect the property from existing flood risk, including raising finished floor levels.

The application includes only a basic indicative safe access and egress route and indicates an intention to prepare a Flood Warning and Evacuation Plan. However, no detailed assessment of flood depths or hazard levels along the access routes has been provided.

RECOMMENDATION

No objection subject to the following conditions

1. **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:

- The applicant should confirm the extent of additional impermeable areas and should indicate how surface water flows arising from these areas will be appropriately managed so as not to increase flood risk to the property or surrounding areas.
- A drainage plan showing existing drainage to be retained, modified or abandoned, and any proposed drainage.
- A plan showing overland exceedance routes that minimise the risk of people and property. This plan should consider the effect of the proposed kerb edge.
- Evidence that finished floor levels will be raised at minimum 150mm above adjacent ground levels.
- 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.
- If access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- 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.
- 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.