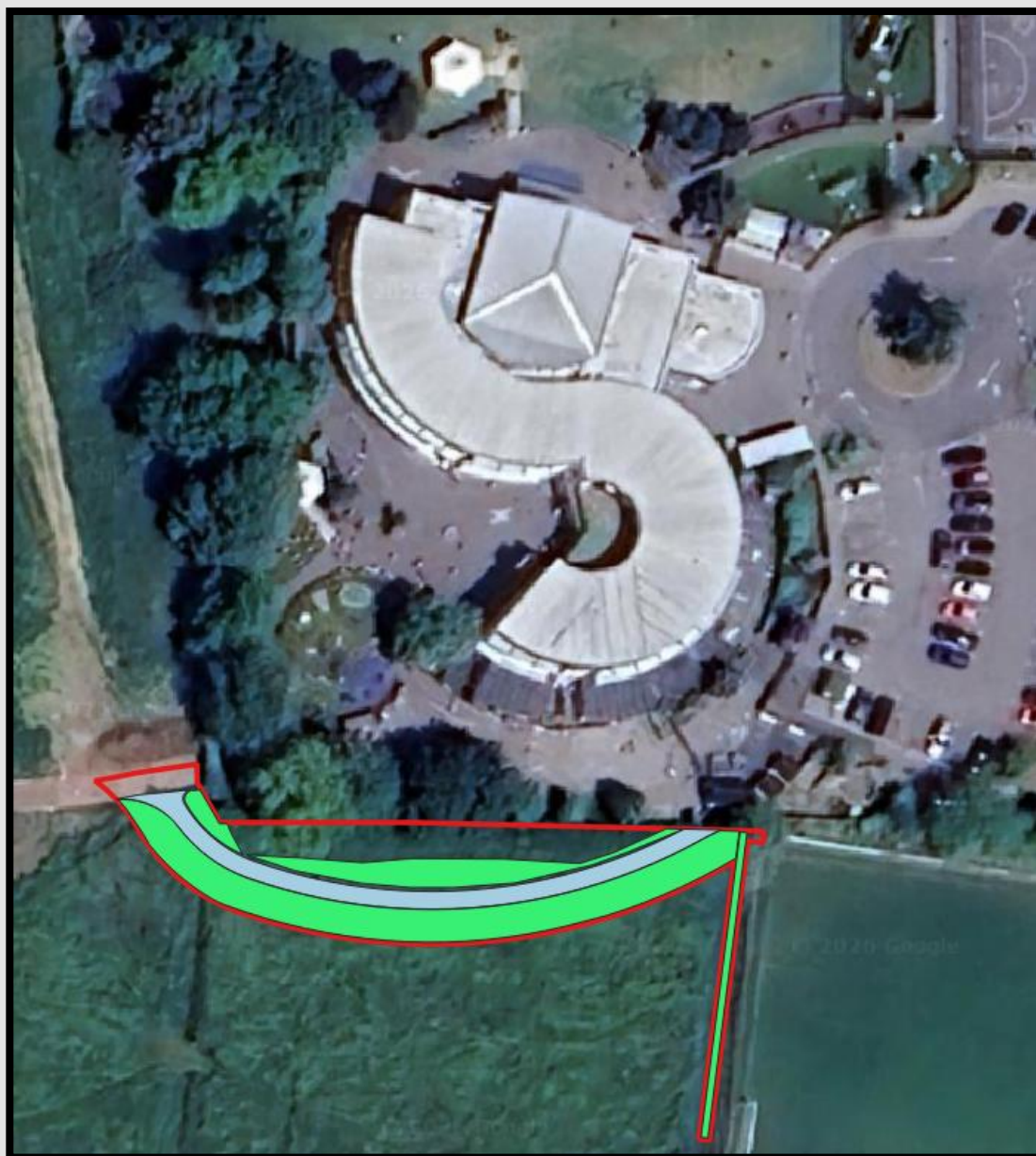




Malmesbury Primary School - New Footpath

Flood Risk and Drainage Constraints

Consulting Structural and Civil Engineers

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1 Introduction

This report has been prepared to support the footpath application, which is minor in scale. The objective of this report is to outline the key flood risk and drainage considerations related to its design, while providing the Local Planning Authority (LPA) with sufficient information to assess the application at this stage.

The general limitations of this report are as follows:

- Several data sources have been used in compiling this report. While AKT II believes them to be trustworthy, it cannot guarantee the accuracy of information provided by others.
- This report is based on the information available at the time of preparation. Further information may become available in the future, which could require modifications to the conclusions presented in this report.

1.1 Site Description

The Malmesbury Church of England Primary School is located on Tetbury Hill, Malmesbury, Wiltshire (SN16 9JR), within the historic core of this ancient market town. The site is well-connected regionally, benefiting from proximity to the M4 motorway, approximately a 10-minute drive, providing strategic links to Bristol, Swindon, and London.

The site lies within walking distance of Malmesbury High Street, which provides a vibrant mix of independent shops, cafés, community services, and is anchored by the landmark Malmesbury Abbey, reinforcing the town's strong cultural and historic identity.

The immediate context of the school is defined by low-rise suburban residential development, predominantly comprising family homes constructed in traditional Cotswold stone and brick, consistent with the established local architectural vernacular.

To the north-west, the Backbridge Farm development is currently under construction, while Punters Farm, located directly to the north, has recently been granted planning permission for residential development, indicating ongoing growth in the area.

The school shares a boundary with the Malmesbury Cemetery and Tennis Club to the north, while to the south, it adjoins the Malmesbury Victoria Football Club, with open green spaces creating a soft transition between the school grounds, neighbouring community facilities, and the wider landscape setting.

1.2 Existing site

The application site comprises a south facing meadow that gradually falls towards Tetbury Avon. A large hedgerow, with occasional tree clumps, separates the school's southern boundary from the application site.

The site is currently undeveloped and is classified as greenfield. The general topography slopes from north to south, with ground levels ranging approximately between 71.6 m and 7.2 m. The site has a gentle overall gradient, with an average slope of approximately 1.5%.

1.3 Proposed site

The proposed development comprises the construction of a new pedestrian footpath and a temporary haul road.

Proposed Footpath

The proposed works deliver a new pedestrian footpath to the south of Malmesbury Primary School, repurposing the alignment of the temporary construction haul road required for the school extension project (PL/2025/07919). Once construction is complete, the route will function solely as a safe, accessible pedestrian link between Sillars Green to the west and Poole Road to the east, improving permeability across an area that is currently inaccessible to the public. The footpath will serve pupils, parents, staff, and the wider community, supporting active travel and reducing reliance on vehicular movements.

Haul Road Proposal

A temporary haul road is being delivered as part of the Malmesbury Primary School extension project (planning ref: PL/2025/07919) to enable construction traffic to access the site safely from the east, via the existing school car park. This haul road will be installed and operational in advance of the footpath proposals described in this application. Its alignment has been designed to accommodate construction vehicles during the build period, after which it will be removed, narrowed, and reinstated to form the permanent pedestrian route. The current application therefore relates only to the post-construction works required to convert the haul road corridor into a high-quality, accessible footpath for public use.

1.4 Summary of Agreements with Wiltshire Council

The following points summarise the key agreements reached with Wiltshire Council during the technical meeting held on 02/04/2026 regarding the footpath proposals:

- Wiltshire Council confirmed that, due to the very small scale and nature of the development, this Technical Note is sufficient, and a full Flood Risk Assessment and Drainage Strategy is not required.
- Fluvial Flood Risk: The footpath would be defined as Water-Compatible development under the NPPF and therefore appropriate within Flood Zone 3, with no need for a Sequential Test. (though noting this would ultimately be the EA advising on fluvial flood risk). The Council noted the intention presented by AKTII that no ground level changes are proposed and that the works will not affect floodplain storage or existing overland flow routes.
- Surface Water Flood Risk: The surface water overland flow path from the north may be present in times of heavy rainfall. This flow route would not be impeded by the proposed footpath
- Surface Water Drainage: It was confirmed that the slight increase in impermeable area results in a negligible impact on surface water runoff, as water would run off into the adjacent meadows as it does currently, and that no positive drainage system is necessary or desirable.

Wiltshire Council agreed that the proposals are neutral in terms of flood risk and drainage impact, and a detail strategy document would not be required.

2 Flood Risk Assessment

2.1 Fluvial flood risk classification for planning

As set out in the National Planning Policy Framework (NPPF), inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. For these purposes:

- “Areas at risk of flooding” means land within Flood Zones 2 and 3; or land within Flood Zone 1 which has critical drainage problems, and which has been notified to the local planning authority by the Environment Agency.
- “flood risk” means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

Flooding information for Planning from the Environment Agency (EA) has indicated the site is located within Flood Zone 3, as found in the map at Appendix 1.

Following the guidance within Annex 3: the proposed footpath would be classified as Water-Compatible development because it is a non-residential, open-access route with no critical infrastructure or sensitive equipment. The pathway is constructed from durable materials that can withstand temporary inundation during flood events without damage, ensuring safety and continuity of public access.

According to Table 3 of the NPPF ‘Flood Risk Vulnerability and Flood Zone Compatibility’, as the development is classified as Water-Compatible, it is considered a permissible use in the flood zone and does not require any further flood risk justification from the perspective of the sequential test.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Key:

✓ Development is appropriate

✗ Development should not be permitted.

2.2 Surface Water Flooding

surface water flooding typically arises because of intense rainfall, often of short duration, that is unable to soak into the ground or enter drainage systems. It can run quickly off land and result in localized flooding.

The Environment Agency has produced illustrative mapping (Flood Map for Surface Water) relating to flooding risks from surface water. The EA maps show high resolution image and indicative flow paths for pluvial events. The maps are based on coarse level data and indicate ridges, valleys and flat spots where water would collect. Typically, the flow paths follow valleys, rivers and watercourses.

The surface water maps and the associated information are intended for guidance only and cannot provide details for individual properties. They do, however, provide high level information and indicate areas in which surface water flooding issues should be investigated further. The risk categories are classified as follows:

- High - greater than or equal to 1 in 30 (3.3%) chance of flooding in any year
- Medium - Less than 1 in 30 (3.3%) but greater than or equal to 1 in 100 (1%) chance of flooding in any given year
- Low - Less than 1 in 100 (1%) but greater than or equal to 1 in 1000 (0.1%) chance of flooding in any given year

A review of the EA mapping, as included at Appendix 2, indicates there is some risk of surface water flooding to the site. However, given that there is no change in the ground levels along the route, surface water can be drained as it would under natural conditions. Furthermore, considering the pedestrian use of the area, the occasional wetness of the footpath is not expected to cause any significant issues.

3 Drainage Constraints

The proposed footpath is located within an area that is understood to be hydraulically connected to the surrounding floodplain. As such, the primary drainage consideration is to ensure that surface water is managed in a way that does not adversely affect existing flood risk conditions, either on-site or elsewhere.

Given the limited scale and largely permeable nature of the adjacent landscape, it is not proposed to provide positive drainage to the footpath, and instead surface water will shed on to the adjacent grass area. The scheme is inherently low risk from a surface water drainage perspective. Surface water is expected to continue to drain naturally to the adjacent landscape, which currently accommodates overland flows and temporary storage during rainfall events. Whilst impermeable area increases, ultimately water would spread over the adjacent soft landscape and infiltrate or be returned to the river. The width of the footpath compared to the width of the downslope meadows is small. It is not considered appropriate to provide positive drainage. Footpaths in parks regularly are provided without positive drainage.

The key drainage constraints for the development are therefore to:

- Avoid any increase in flood risk elsewhere, in line with national planning policy.
- Maintain existing ground levels to prevent displacement of floodwater or loss of floodplain storage.
- Preserve existing overland flow routes.
- Avoid the concentration of runoff that could increase flow rates or volumes to surrounding areas.

In this context, the introduction of formal positive drainage systems is not considered necessary or proportionate to the scale of development. Instead, the design approach seeks to maintain existing drainage patterns and ensure that the proposals remain neutral in terms of flood risk impact, consistent with the principles of sustainable drainage.

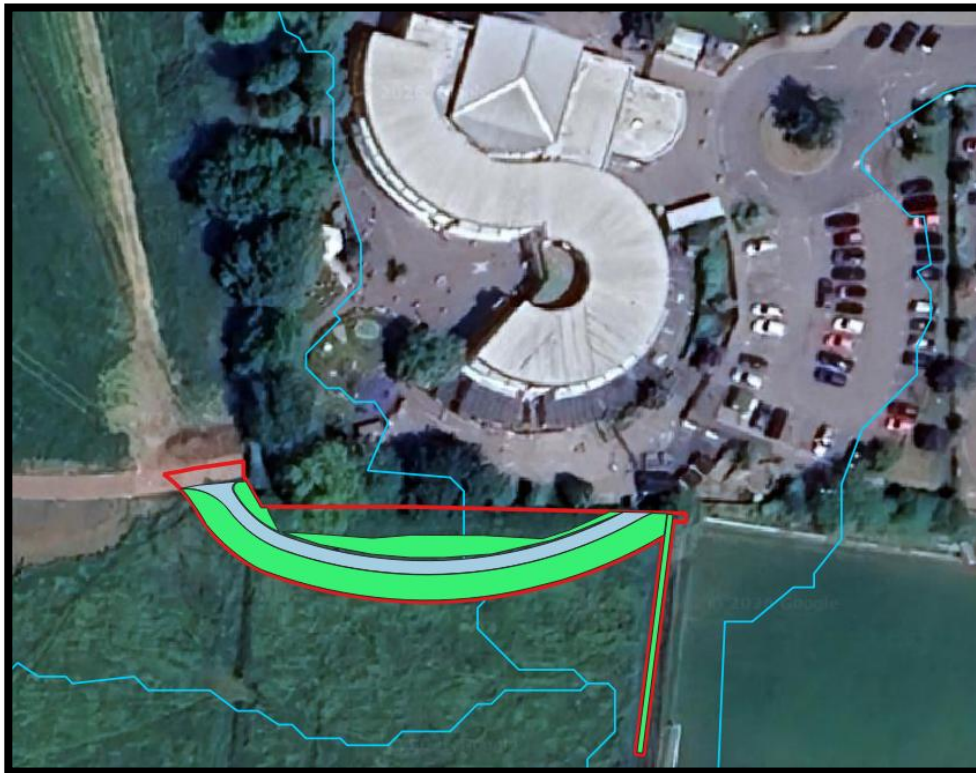


Fig01 - Natural overland flow pathway in the surrounding area of the proposed footpath/Temporary Haul Road

4 Levels Constraints

Generally, it is not permitted to raise levels in the flood plain. As such, it is proposed that the footpath shall retain the same levels as the existing. A detailed level for level cut and fill exercise would not be permitted.

In this regard, the proposed levels for this purpose is shown in the figure below.

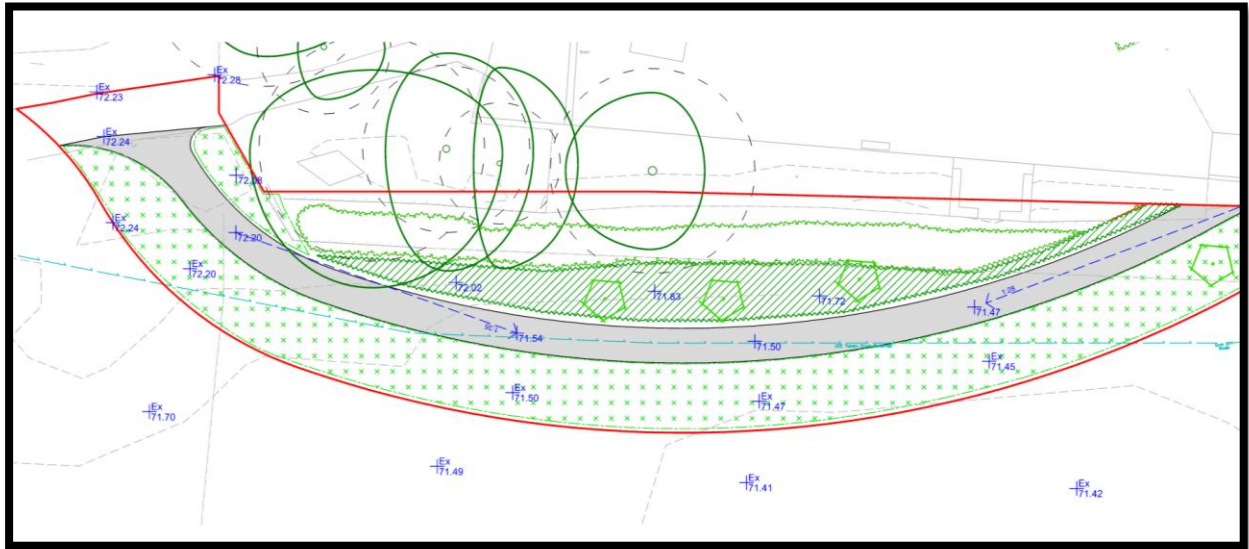


Fig02 - Proposed levels for the new footpath, as shown in the landscape architectural plan

5 Mitigation Measures for Temporary Haul Road

The haul road is temporary, and its levels will be broadly consistent with the existing ground to minimize disruption to the surrounding site, as illustrated in the map in Appendix D.

During the construction period, the contractor will implement appropriate surface water management measures, including collection, diversion, and treatment as necessary, to ensure that runoff is of sufficient quality. These measures are designed to mitigate potential flood risks and prevent any adverse impacts on the site, surrounding areas, and existing infrastructure. Once construction is complete, the haul road will be removed and reinstated as a permanent pedestrian route, with the site fully restored.

Appendix 1: EA Fluvial Flood risk map for Planning



Flood map for planning

Your reference
Unspecified

Location (easting/northing)
392916/187907

Created
19 March 2026 15:18

Your selected location is in flood zone 3, an area with a high probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>)

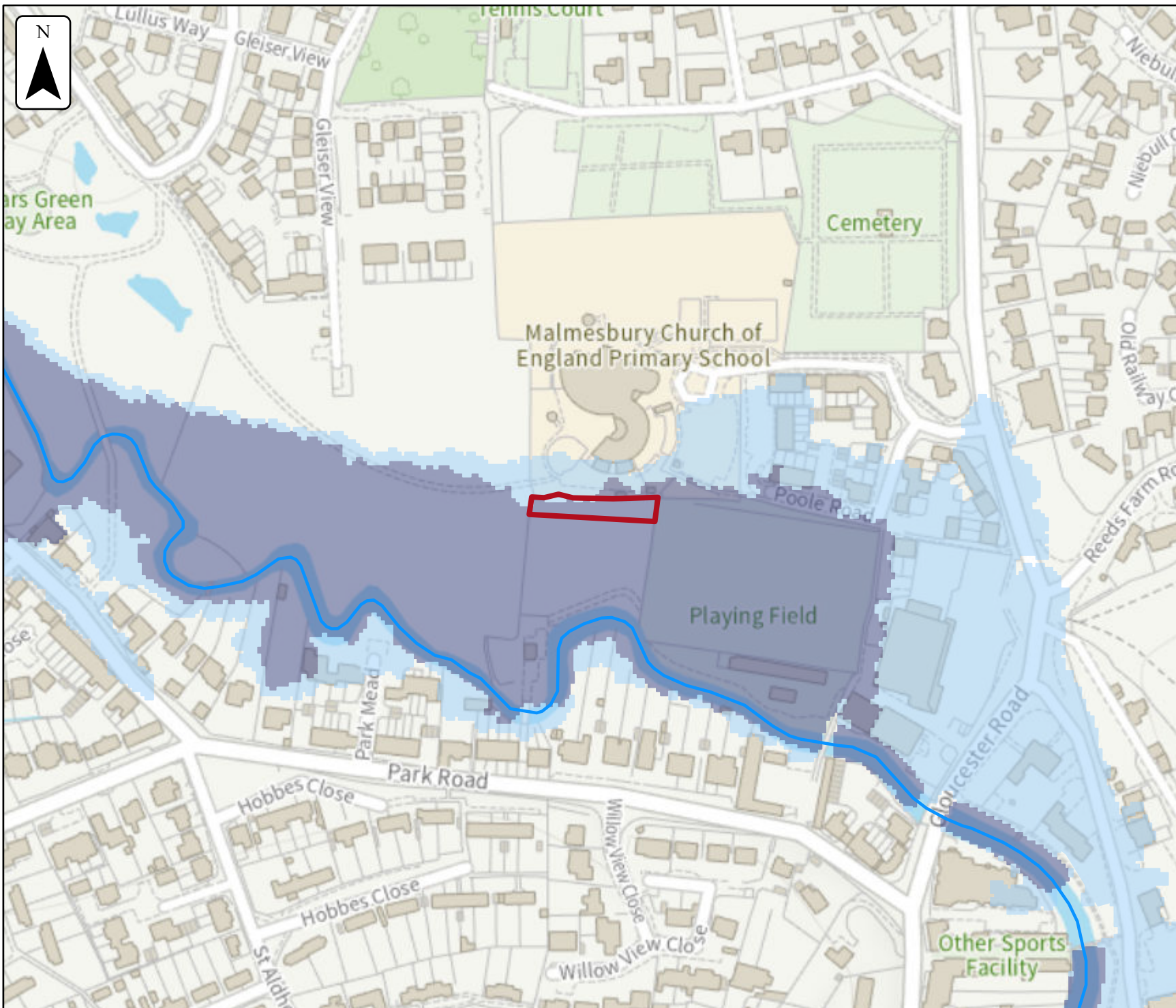
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence which sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3>

Use of the address and mapping data is subject to Ordnance Survey public viewing terms under Crown copyright and database rights 2026 AC0000807064. <https://flood-map-for-planning.service.gov.uk/os-terms>



Flood map for planning

Your reference

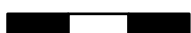
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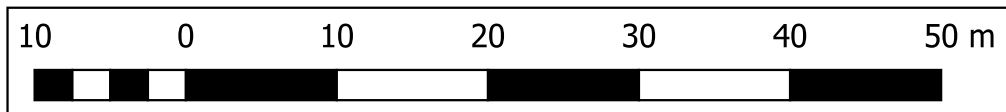
Location (easting/northing)
392916/187907

Scale
1:2,500

Created
19 Mar 2026 15:18

-  Selected area
-  Flood zone 3
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Water storage area


0 20 40 60m



Proposed Fottpath

Footpath

Green

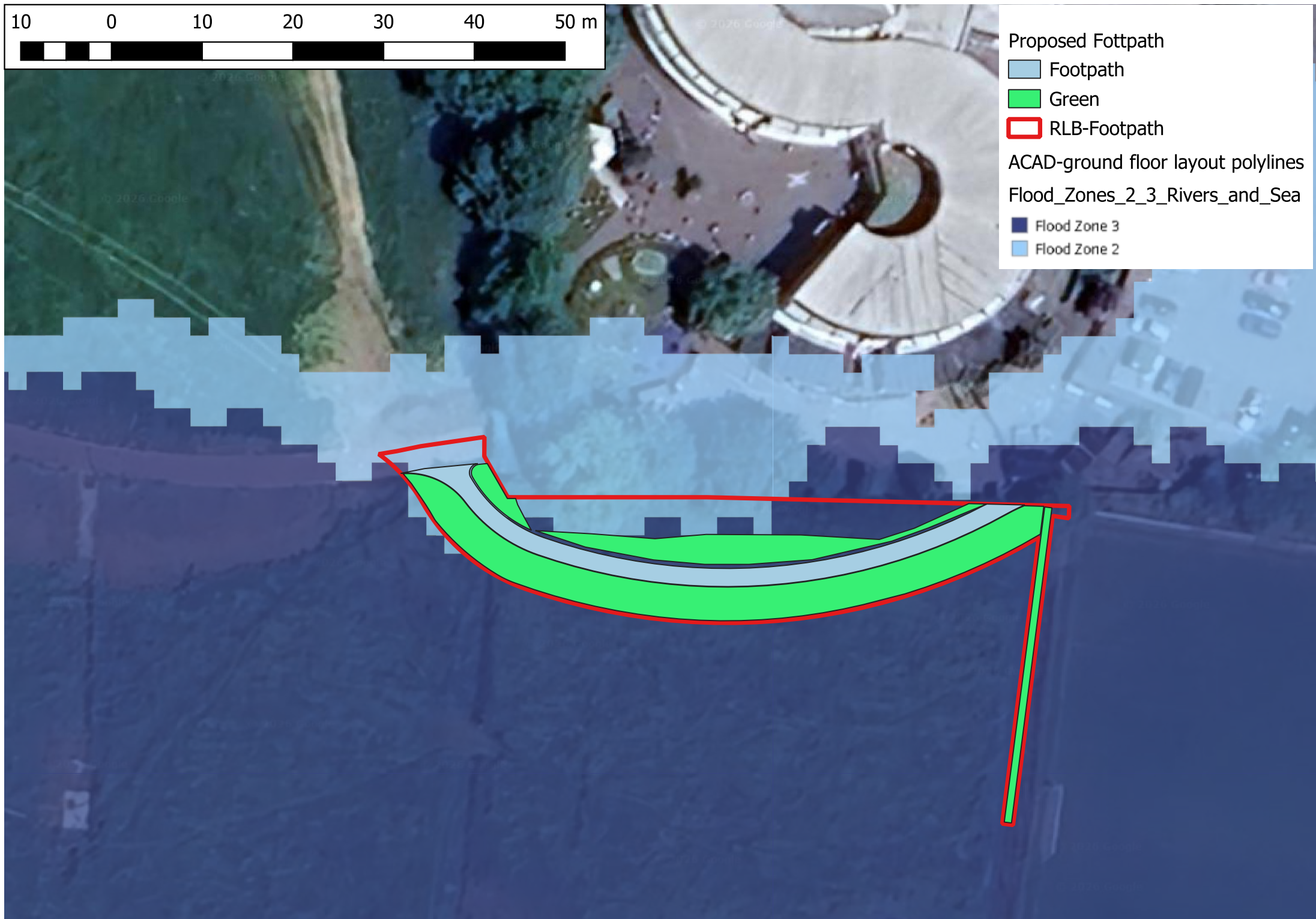
RLB-Footpath

ACAD-ground floor layout polylines

Flood_Zones_2_3_Rivers_and_Sea

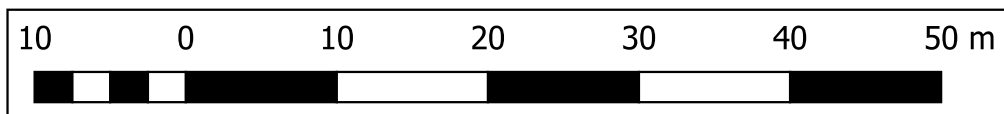
Flood Zone 3

Flood Zone 2



Appendix 2: EA Surface Water risk map



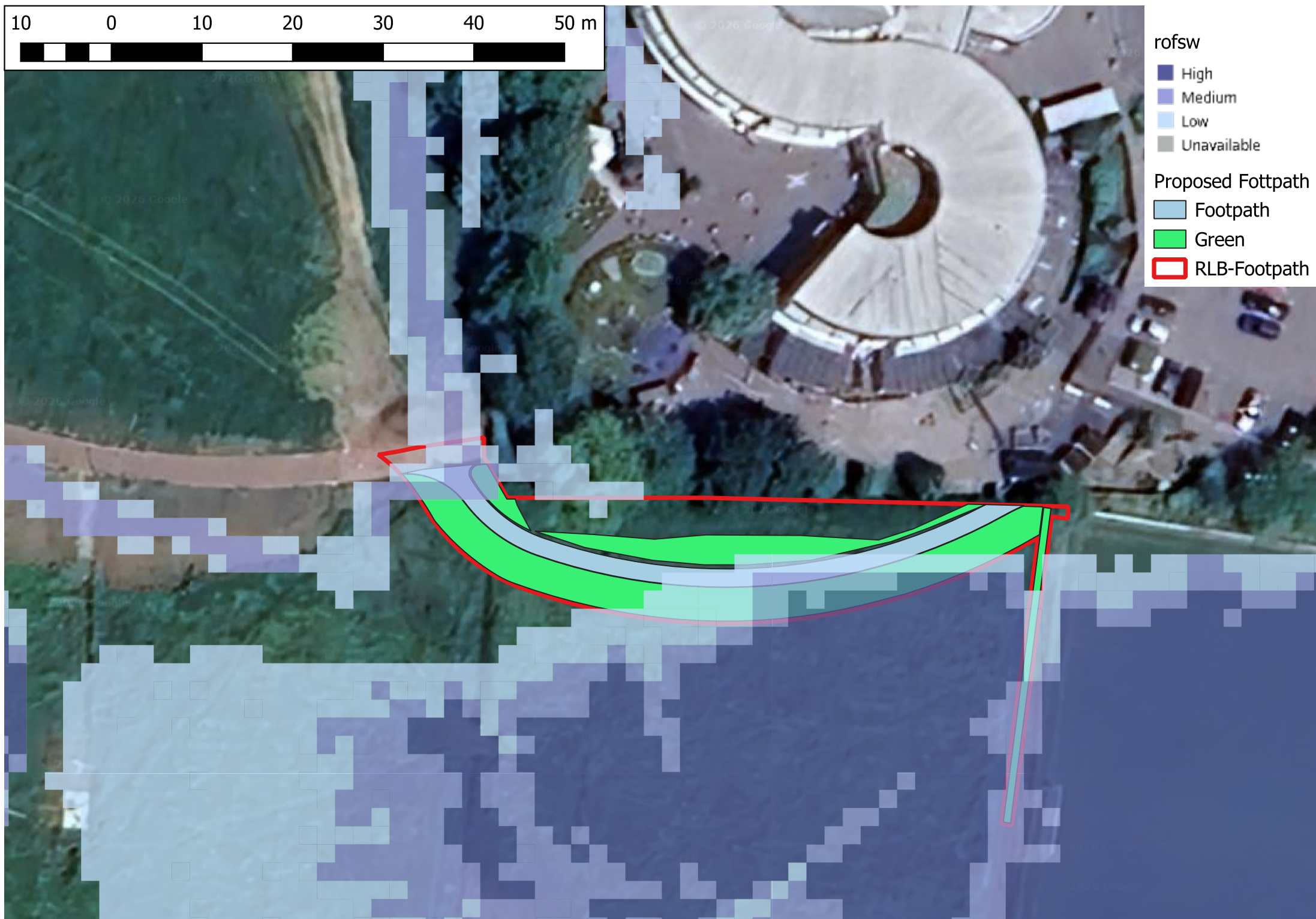


rofsw

- High
- Medium
- Low
- Unavailable

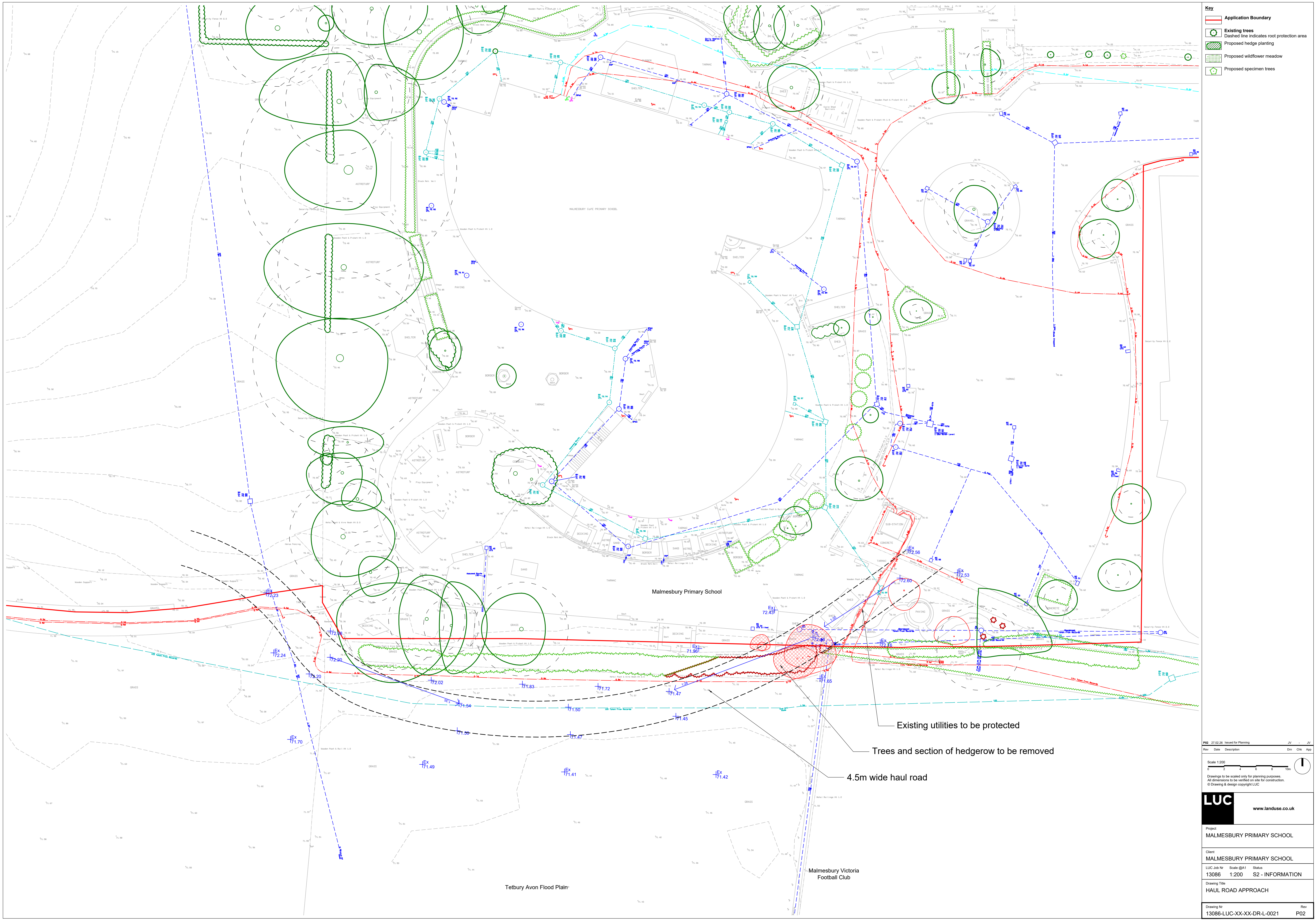
Proposed Fottpath

- Footpath
- Green
- RLB-Footpath



Appendix 3: Haul Road Approach Map



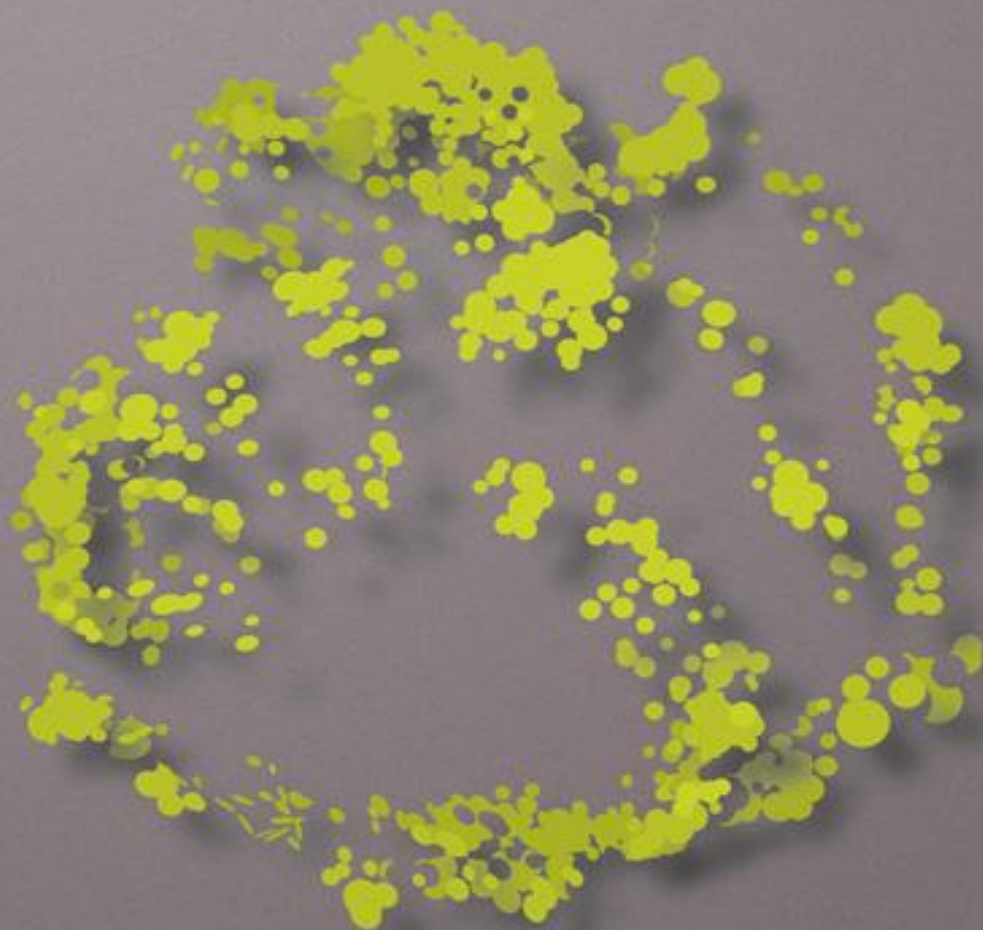


Key

- Application Boundary
- Existing trees
- Dashed line indicates root protection area
- Proposed hedge planting
- Proposed wildflower meadow
- Proposed specimen trees

PG2 27.02.20 Issued for Planning JV JV
Rev Date Description Dm Chk App
Scale 1:200
Drawing to be scaled only for planning purposes.
All dimensions to be verified on site for construction.
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Project
MALMESBURY PRIMARY SCHOOL
Client
MALMESBURY PRIMARY SCHOOL
LUC Job Nr 13086 Scale @A1 Status S2 - INFORMATION
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Drawing Nr 13086-LUC-XX-XX-DR-L-0021 Rev P02



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