

To:	Kenny Green	From:	James Playfair
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Planning App Ref:	PL/2026/00876
Service Ref:	Drainage
Date:	15 April 2026

PROPOSAL

Change of use of land to provide a Gypsy site, consisting of four pitches and associated hardstanding, landscaping and commercial barn (Revised Proposal following allowed appeal pursuant to PL/2023/00900)

SITE LOCATION

Charlie's Place, Land off Sodom Lane, Grittenham, Royal Wootton Bassett, SN15 4JY

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

- 6578 SW DS REV 2.20 SO
- 6578-C-SK02 REV - SuDS DETAIL
- 6578-C-SK01 REV A - DRAINAGE STRATEGY

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.

The application has been supported with a Site-Specific Flood Risk Assessment (FRA), including a Flood Evacuation Plan. 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.

In 2023 the LLFA requested the flowing conditions be met before any development could commence. These have yet to be provided to the detail required.

- 1 No development can commence until a Drainage Strategy has been provided.
- 2 A detailed foul water drainage strategy, which provides evidence as to how each of the EA General Binding Rules have been complied with (or if this is not possible, that an environmental permit has been obtained from the EA)

Assessment

6578-C-SK01 REV A - DRAINAGE STRATEGY

This provides an overall drainage strategy proposal.

Filter Drains

- Filter drains are shown serving:
 - Graveled pitch / permeable surfaced areas.
 - The northern side of the access track via a filter carrier drain.
- These features provide interception, conveyance, and initial treatment of runoff prior to discharge.

Attenuation Pond

- A central attenuation pond is proposed to manage surface water runoff.
- The pond has:
 - 1.6 m maximum depth
 - Approx. 188 m² plan area
 - Side slopes of 1:3
- Pond banking is shown, and its location takes account of mapped Flood Zones 2 and 3.

Flow Control

- Surface water discharge from the site is restricted via a flow control chamber.
- Discharge is limited to 0.5 litres per second.

Outfall

- A new ditch is proposed to provide an outfall to an existing watercourse.
- This ditch will convey both attenuated surface water and treated effluent from the site.

Exceedance Routing

- Exceedance flow arrows are indicated on the drawing, demonstrating that flows in events beyond the design capacity are directed safely towards the attenuation feature and away from vulnerable areas.

6578-C-SK02 REV - SuDS DETAIL

This shows cross sections of the proposed attenuation pond. A freeboard of 0.166m is proposed which, according to the section, is above 1 in 100Yr level but it's not clear if it's above the **1 in 100 yr +CC level**. Even if this is the case, sufficient freeboard has not been provided.

6578 SW DS REV 2.20 SO

These details calculations relating to the sizing of the attenuation pond. The CV value is set to 0.75 for summer and 0.840 for winter. A safety factor of 2 has been used. The design flow of the flow control is 0.5l/s but discharge rates for each return period event have not been presented and how that compares to existing.

The additional storage is 20m³/ha.

RECOMMENDATION

Holding Objection

In order for us to remove our holding objection we would request the developer provides the following information in accordance with the [National Standards for SuDS](#):

Standard 2: interception

- Calculations to demonstrate that sufficient interception storage is provided. The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.

Standard 3: management of extreme rainfall and flooding

- Evidence that there is sufficient freeboard (300mm minimum) above the critical 1 in 100yr + climate change storm event.
- The additional storage is 20m³/ha - this needs to be revised to be 0 so as not to overpredict attenuation capacity. This is important as the system may need to be remodelled to prevent flooding as a result of this.

Standard 4: water quality

- The applicant must provide a pollution hazard assessment for all areas draining to SuDS features, and demonstrate that the proposed treatment train achieves the required pollution mitigation indices for suspended solids, metals, and hydrocarbons, using the Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3).
- At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs).
- Calculations and supporting plans must be submitted to evidence compliance.
- A maintenance plan must be provided to ensure the long-term effectiveness of water quality treatment.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations so as this can be tied to the hydraulic model.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.

Evidence as to how each of the EA General Binding Rules have been complied with (or if this is not possible, that an environmental permit has been obtained from the EA).

The applicant is to confirm that the discharge rates from the treated effluent have been added to the SW discharge rates to give total discharge rates. This must be compliant with betterment policy etc.

INFORMATIVES

WC issues land drainage consents for discharges to ordinary watercourses and also for any works within 8m