

To:	Peter Crozier	From:	Rahul Dixit
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Planning App Ref:	PL/2026/02519
Service Ref:	Drainage
Date:	11/05/2026

PROPOSAL

Proposed Change of Use to Create 2no. Dwellings.

SITE LOCATION

Units 7-10 Church Farm, Bath Road, Shaw, Melksham, SN12 8EF.

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
- Existing Ground Floor Plan
- Flood Risk Assessment
- Location Plan and Elevations
- Proposed Block Plan
- Proposed Ground Floor Plan
- Contaminated Land Investigation

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.

As per the Flood Risk Assessment, the site is located within Flood Zone 1 and is at low risk of fluvial flooding. Flood risk to the proposed site from groundwater is also low.

The predicted RoFSW flood depths show a modelled flood depth of 0.2m and 0.3m within the site. The next assessed flood depth is 0.6m in which there is no RoFSW shown within the site.

Figure 1: EA RoFSW extents

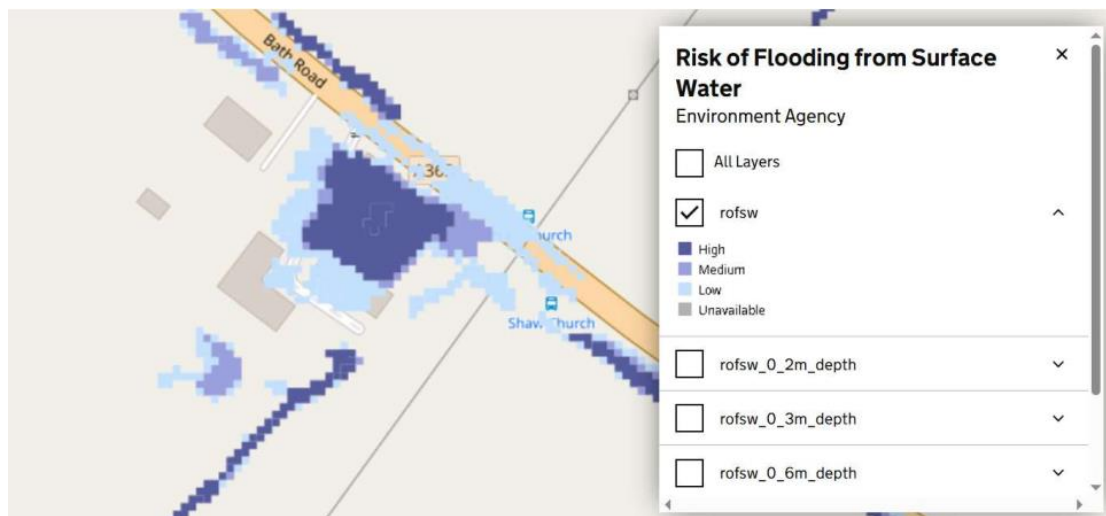


Figure 2: RoFSW Depths





The Application seeks permission for conversion of existing commercial Units 7–10 to residential development. the proposed change of use to create 2 No. dwellings. This changes the Flood Risk Vulnerability Classification category of the development.

As no external alterations to the existing structure are proposed and the development is limited to internal changes only, it is not anticipated that there would be any increase in surface water runoff arising from the proposal.

The FRA states:

Bio retention areas and rain gardens are to be implemented within the site where applicable to do so to improve water quality and provide additional SuDS measures

That said, the information submitted does not clearly identify the existing surface water drainage arrangements serving the site. The applicant is therefore required to provide clear confirmation and details of the existing surface water drainage system, including the point of discharge and its current performance.

RECOMMENDATION

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, Non-Statutory Technical Standards for SuDS 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:

- Details of the existing surface water drainage system including the current condition and discharge point.
- Details on impermeable areas and proposed SuDS features alluded to in the FRA and how these may affect the risk of pluvial flooding
- 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](#).

INFORMATIVES

- 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.
- 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.

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.