

To:	Sam Stockley	From:	Ben Wilding (Drainage)
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Planning App Ref:	PL/2026/00838
Service Ref:	Drainage
Date:	08 June 2026

PROPOSAL

Full Planning

Construction of an Agricultural Building, relocation of an existing building, construction of an additional stable and menage and creation of hardstanding

SITE LOCATION

46 Malmesbury Road, Leigh, Swindon, SN6 6RH

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

- Design and Access Statement
- Drainage Plan
- Drainage Strategy
- Drainage Menage Cross Section

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

It should be noted that our comments below are reliant on the accuracy and completeness of the applicant's submission pack and we do not take any responsibility for incorrect data or interpretation made by the authors.

Based on EA's RoFRS mapping, the site is located within Fluvial Flood Zone 1. The majority of the site is shown to be at low pluvial flood risk based on the EA's RoFSW mapping, however higher pluvial flood risk is shown to the north of the site and to the south to Malmesbury Road. The site is not expected to be at high risk of groundwater flooding due to the underlying clay-based geology.

The applicant is proposing to increase impermeable footprint on site to 1951m² and proposes to discharge flows to the south to an existing highways drainage ditch; the applicant notes that this ditch does not appear on existing mapping, nor have photographs or survey been provided in order to demonstrate that this is a credible outfall position. It is noted that the applicant has not visited the site in producing their drainage strategy. We would advise that applicant's consultants should always visit the site in question when developing a drainage strategy. As this is a full planning application, the outfall location must be confirmed and not left ambiguous for subsequent stages (the drainage team must ensure that a viable drainage strategy for the site exists).

Based on our assessment of the topography, using lidar data, the existing site appears to drain to the north (rather than towards the highway as proposed by the applicant), meaning that catchment transfer could be generated by the proposals. Our comments are set out below based on the National Standards for SuDS.

Standard	Comments
1 – Surface Water Disposal Hierarchy	- The applicant has not fully considered rainwater harvesting on site – water reuse must be considered as the priority means of disposal - No infiltration testing has been undertaken on site to understand what infiltration capacity exists
2 – Interception	- No interception calculations have been provided to demonstrate that the first 5mm of runoff is intercepted as per National Standard 2 - The applicant has proposed lined permeable paving, meaning that these features are limited in the interception storage benefit that is provided – the applicant should provide justification as to why lining is proposed if there are not groundwater level concerns on site. - Based on the plans submitted to date it is currently unclear as to how interception will be provided for the new agricultural building

Standard	Comments
3 – Water Quantity	- Based on LiDAR of the existing site it appears that the existing topography falls to the north rather than towards the road. The applicant should therefore submit catchment analysis to demonstrate that they are not proposing catchment transfer and therefore increasing risk elsewhere. - Pipe levels and gradients / hydraulic calculations to demonstrate that the pipes are sufficiently sized have not been provided.
4 – Water Quality	Currently pollution indices commensurate with individual property driveways have been selected – we believe that the “commercial yard” pollution index is more appropriate given the agricultural setting, however note that the permeable paving would still provide sufficient mitigation.
5 - Amenity	The applicant has not considered SuDS features which provide increased amenity or biodiversity benefit. The use of green SuDS features such as tree-pits / swales / raingardens should be considered, with comments provided as to why these have not been selected if they are unsuitable
6 - Biodiversity	
7 – Construction, operation, maintenance, decommissioning	The applicant currently has not provided a CEMP to demonstrate how water quantity and quality will be safely managed during construction to prevent an increase in flood or pollution risk elsewhere.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

1. A detailed drainage strategy which complies with the National Standards for SuDS and addresses the LLFAs highlighted comments, in order to demonstrate that a viable outfall exists, and that the proposals will not increase flood / pollution risk elsewhere.

Once the above holding objection has been removed, we would recommend the following standard conditions are applied.

Construction Environment Management Plan

No development shall commence until a Construction Phase Plan, demonstrating how water quality and quantity will be safely managed such that there is not an increase in flood or pollution risk elsewhere, has been agreed in writing by the LPA in consultation with the LLFA.

As-Built SuDS and Watercourse/Ditch Modification Drawings (AutoCAD Format)

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:

1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
2. As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
 - AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
 - PDF format for record purposes.

4. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.
5. 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.

Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

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.