

To:	James Taylor	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2026/03545
Service Ref:	Drainage
Date:	13/07/2026

PROPOSAL

Outline Planning Application for up to 400 dwellings (Class C3 use), land for a Local Centre, accommodating commercial, business and service uses (Class E use), drinking establishment and hot food takeaway (Sui Generis); and local community uses (Class F2); open space and landscaping to include natural green space, amenity green space, area of formal play, allotments and community orchard, sustainable drainage infrastructure and ground remodelling. All matters reserved except for the formation of a new vehicular access and cycle and pedestrian access including emergency access onto the B4528.

SITE LOCATION

Land east of Showell Farm, Chippenham, Wiltshire

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

- *Application Form*
- *Site Location Plan*
- *Planning Statement*
- *Environmental Statement – Volume 2 – Appendix 1.1 – Site Location Plan*
- *Environmental Statement – Volume 2 – Appendix 1.1 – FRA*

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 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.

Unless stated otherwise, all section references below relate to the Flood Risk Assessment, document reference: 13143 FRA01 Rv3 (26/05/26)

It is noted the applicant has provided groundwater monitoring results from December 2023 to May 2024 outlining groundwater is present within 0.5m of the surface.

The applicant has also provided infiltration testing results, which largely infer infiltration is not likely to be feasible for surface water disposal. However TP06 and TP08 may feasibly infiltrate to enable a partially infiltrating surface water drainage strategy. As the initial infiltration testing was curtailed, and only one test was completed at each trial pit, infiltration testing compliant with BRE365 testing is required in the location of TP06 and TP08 to demonstrate adherence with the drainage disposal hierarchy (Standard 1).

It is noted in Section 7.3 the applicant is proposing to restrict flows to 15.43l/s, demonstrating compliance with Wiltshire Council's Betterment Strategy by providing a minimum of 30% betterment on each of the 1 in 1, 30 & 100 year event (greenfield calculations in Appendix F).

RECOMMENDATION: Holding Objection

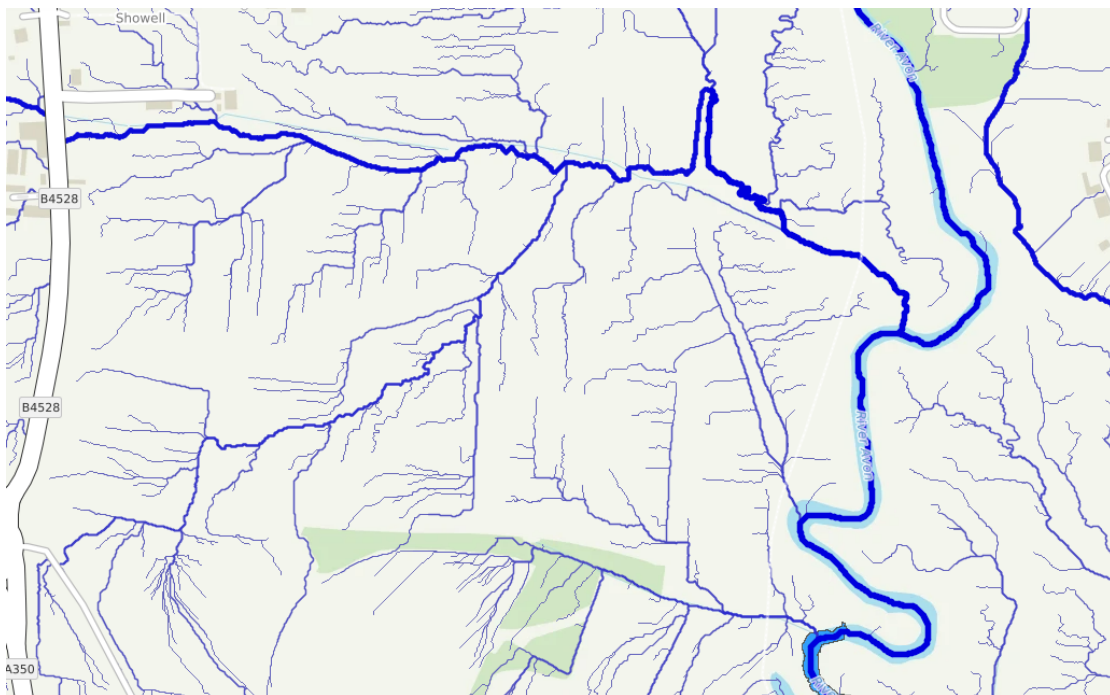
1. The applicant must provide further information related to the surface water drainage strategy:

- a) Observing the site's topography (snip below), there are several existing flow paths running across the site, primarily from the southern portion of the site & towards the drainage channel, prior to outfalling into the Avon.

Whilst it is noted the applicant has taken a sequential approach with regards to developing the area within Flood Zone 1 only, it is unclear how flow paths will interact with the site & the applicant must demonstrate that flood risk will not be increased elsewhere.

In accordance with Standard 3 of the National Standards for SuDS the applicant must outline the overland exceedance on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate there will be no adverse flood risk to the development or elsewhere as a result of the proposals

It is noted in Figure 2 there is an existing drainage channel running west to east just to the north of the developable area at the site. The applicant must confirm this channel will be preserved and demonstrate that there will be no increase in flood risk because of the development.



- b) In section 6.3.0.10 the applicant has stated that "there is not sufficient demand for non-potable water to include a larger scale collection". The LLFA is confident that rainwater can be re-used and incorporated across the site & this must be explored by the applicant at the Outline stage.

The applicant must demonstrate how rainwater re-use can be incorporated into the strategy for housing & the local centre, or provide details justifying why rainwater re-use cannot be incorporated. The LLFA would recommend consideration of re-use opportunities such as irrigation & toilet flushing which could be integrated into the development. The LLFA requires commitment from the applicant at Outline stage, and will not accept ambiguous statements such as "reuse can be incorporated where possible".

- c) The applicant must provide calculations to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the

ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS.

- The applicant must comment on rainwater re-use and detail proposals to incorporate into the drainage design – notably whether this will be at the individual plot or site level.
- It's noted at reserved matters the applicant will propose further SuDS blue/green & source-control features that will contribute to interception calculations (6.3.0.13)
- This is particularly important as several SuDS features will be impermeably lined
- Noted the applicant has requested interception be handled at reserved matters (7.2.0.5), however this demonstrating compliance with Standard 2 is required in principle at Outline

Once the applicant has resolved the points above, the following information can be provided at the Reserved Matters stage of application:

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.

- a) It is noted in section 6.3.0.11 that the applicant has deemed infiltration “not suitable” for the disposal of surface water from the site. The LFFA recognise several areas of the site have groundwater encountered within half a metre of the surface, and infiltration testing has inferred that infiltration is not feasible in several locations.

Despite this, at TP06 & TP08, there appears to have been only one test at each, both curtailed due to time constraints. Infiltration could be possible at these locations, and groundwater was recorded at 2.1m below ground level (page 6 of the Infiltration Testing Report).

At detailed design & in accordance with the drainage disposal hierarchy, the applicant must demonstrate that a partially infiltrating drainage strategy, with shallow features, is not feasible to harness as much infiltration as possible. The applicant must undertake further ground investigations & complete three tests at each trial pit (in accordance with BRE365 methodology) to demonstrate adherence to the drainage disposal hierarchy (Standard 1).

- b) At detailed design, the applicant must provide evidence of flotation calculations, or evidence of pond lining, as the FRA / Ground investigations show that ground water has been encountered at a level that could interact with drainage features.

It is noted in section 4.5.4.28 the applicant has provided some outline considerations on potential mitigation to flotations, and stated further information to be provided at reserved matters.

- c) At detailed design, further SuDS features must be proposed to demonstrate adherence to Standards 5 & 6, will supporting interception in line with Standard 2.

It's noted in section 10.1.1.8 the applicant has suggested tree pits & raingardens may be incorporated down the line, while several SuDS are to be considered at detailed design as discussed in Table 6-2, section 6.3.0.13.

- d) While the applicant has demonstrated compliance with the Simple Index Method for water quality. At detailed design, the applicant must provide commentary outlining a minimum two-stage treatment train prior to discharge to ensure compliance with Standard 4.
- e) It is noted the applicant has stated the FFL will be set a minimum of 600mm above recorded groundwater levels (10.1.1.5). The applicant must ensure either this approach, or 300mm above adjacent ground level, whatever provides the most protection, is adopted to provide sufficient flood risk mitigation to proposed property.
- f) The applicant must provide evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.
- g) The applicant must provide 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.

- h) The applicant must provide evidence that urban creep has been accounted for the hydraulic calculations in line with LASOO guidance.
- i) At detailed design, the applicant must provide cross & long section drawings and sizing calculations of all proposed SuDS features
- j) The applicant must submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.
- k) The applicant must provide a construction management plan outlining how flood risk to people & property, and pollution risk to groundwater & watercourses will be mitigated throughout construction.

INFORMATIVES

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](#).

The applicant must gain an agreement from the sewerage undertaker for the region to discharge foul flows into their network.

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 set outs 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.