

To:	Isobella Wise	From:	Drainage (Cecily Austin)
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Planning App Ref:	PL/2026/04916
Service Ref:	Drainage
Date:	01/10/2026

PROPOSAL

Outline planning permission: Some matters reserved

Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.

SITE LOCATION

Land west of Semington Road, Melksham

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

- Cover Letter
- Demolition Parameter Plan
- Flood Risk Assessment
- Location Plan
- Phase 1 Ground Conditions Assessment - Part 1
- Phase 1 Ground Conditions Assessment - Part 2
- Planning Statement
- Preliminary Drainage Strategy Plan
- Topographical Survey

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

Flood Risk Review

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.

It is noted that the site is located within Flood Zone 1 and is not affected by recorded sewer flooding. The site is identified as being at a moderate risk of groundwater flooding and at varying levels of surface water flood risk, ranging from low to high across the site. The submitted Flood Risk Assessment recommends that groundwater monitoring be undertaken to further investigate groundwater conditions and inform the detailed drainage design. The LLFA supports this recommendation and advises that the investigation is undertaken. Given the current time of year, the applicant should start GW monitoring imminently so as a full year of data can be obtained on the site to inform future design stages.

It is also recommended that, once a final site layout has been prepared, updated surface water flood mapping is overlaid onto the proposed development layout to ensure that areas of surface water flooding do not impact any proposed residential units. This requirement should be secured by condition.

Safe access and egress can be achieved from the site, and general mitigation measures, including the raising of finished floor levels a minimum of 300mm above surrounding ground levels, have been identified.

Drainage Review – General

It is noted that the applicant proposes to discharge surface water to Berryfield Brook, located to the south of the site. The applicant has demonstrated that infiltration is not feasible, and it is acknowledged that large-scale rainwater harvesting is not practicable. Property level water butts are therefore proposed to provide a degree of rainwater reuse, and the proposed discharge location is accepted in principle. Proposals satisfy Standard 1 of the national standards for SuDS through this review.

Interception calculations have been provided at a preliminary level however these will need to be refined at the detailed design stage. Assumptions have been made regarding interception provided by features such as swales and permeable paving, but these features have not yet been fully defined given this is only at outline design stage. Full interception calculations

should be provided as part of the discharge of conditions response to ensure Standard 2 is fully satisfied.

The proposed discharge rates are also accepted in principle, as they comply with Wiltshire Council standards. However, as this is an outline application, it is anticipated that the extent of impermeable area may change during the detailed design process. A condition should therefore be applied requiring the final discharge rates to remain compliant with the relevant standards and to include a 10% urban creep allowance once roof areas and impermeable extents have been finalised.

Water quality, amenity, and biodiversity considerations (Standards S4, S5, and S6) have been discussed and are considered to comply in principle. However, these assessments should be revisited once a detailed site layout is available to ensure compliance is maintained.

A number of attenuation basins are proposed across the site. It is noted that the basins alone do not provide sufficient storage for all exceedance events, and therefore an overflow area has been proposed. This area is intended to function both as an amenity space and as exceedance storage during more extreme rainfall events, receiving flows via overflow weirs and pipe connections should the basins become overwhelmed. This approach is acceptable in principle however, detailed hydraulic modelling should be undertaken to demonstrate its operation and confirm that it will not increase flood risk elsewhere within the site. Details should also be provided regarding how the area will safely function as both a public amenity space and an exceedance storage area. This should be secured by condition.

A SuDS maintenance plan has been submitted, and a brief discussion of surface water management during construction has been provided. However, a detailed Construction Surface Water Management Plan will be conditioned. This should set out the proposed methods for managing surface water runoff during construction, identify material storage areas, and demonstrate how pollution risks to receiving watercourse will be mitigated.

Drainage Review – Canal Proposals

It is noted that proposals exist for a new canal running through the centre of the site, which was approved by the LLFA in August 2025 under application reference W/12/01080/FUL. Whilst this proposal is briefly referenced within the FRA and SuDS Statement, insufficient consideration has been given to its interaction with the proposed drainage strategy. The plans indicate that several SuDS features have been located within the corridor identified for the canal. This raises issues regarding the feasibility of the proposed drainage design, as SuDS features are positioned within the canal area – please see screenshots below. On this basis, the LLFA requests a holding objection on this application as current proposals are mutually exclusive.

The applicant should provide an overlay of the approved canal alignment and the proposed drainage layout to demonstrate compatibility between the two schemes. The drainage strategy should then be revised as necessary to accommodate the canal infrastructure. Furthermore, the FRA should assess the canal proposals and consider any implications for flood risk, including the identification of appropriate mitigation measures where required.

Figure 2.6: The Intersection of the Proposed Canal Route with the Application Site (red line)

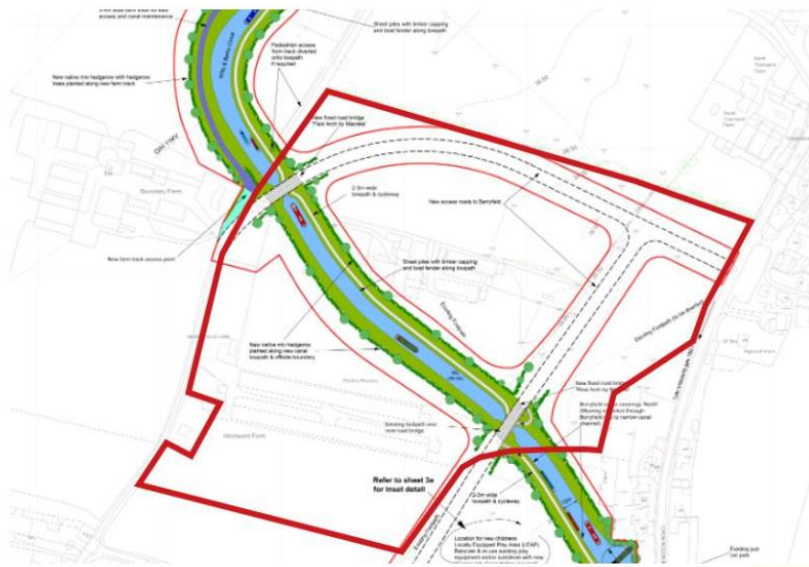


Figure 1: Approved route of Canal

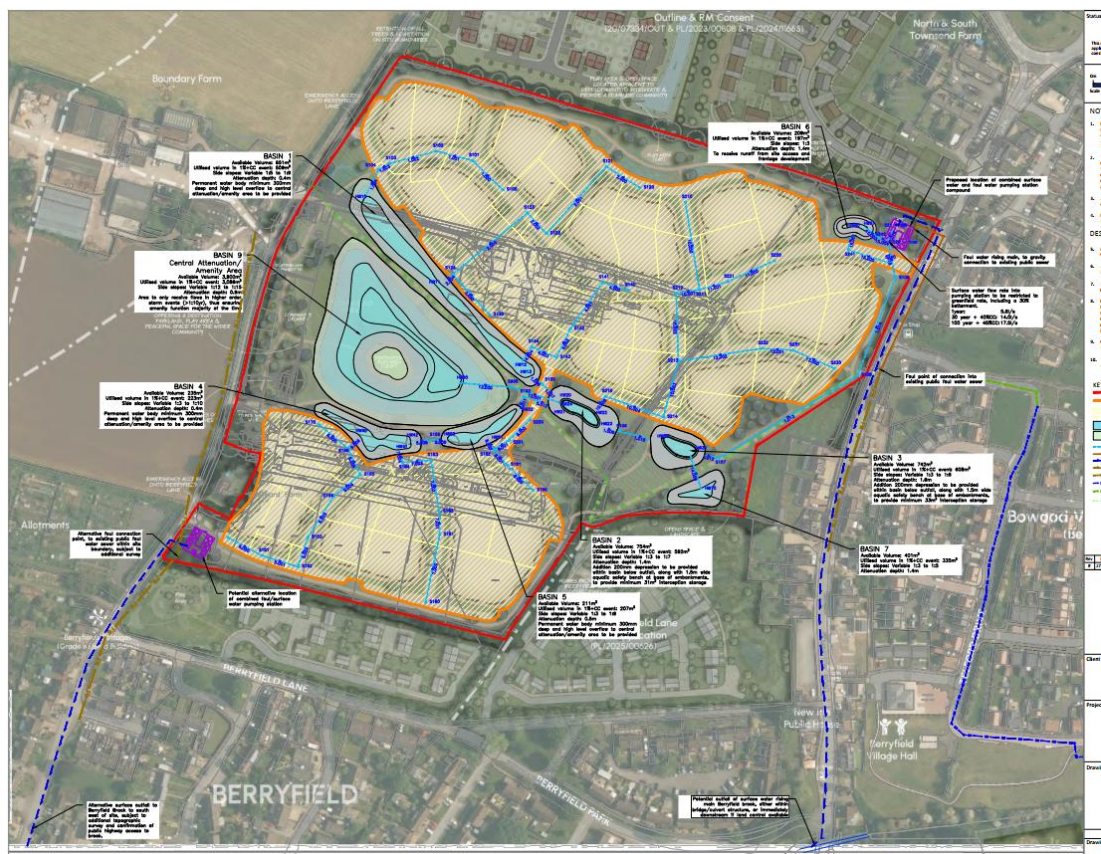


Figure 2: Proposed SuDS Layout

Drainage Review – Proposed Pumping

Although the proposed discharge location complies with the drainage hierarchy, the applicant proposes to pump surface water from the site. On developments of this size, where sufficient

space appears available for above-ground attenuation features, the use of pumping stations should generally be avoided where feasible.

The applicant should revisit the need for the proposed pump arrangement, as there may be scope for alternative solutions which may allow connection via gravity, including the provision of shallower attenuation basins with larger footprints, or a consideration of other SuDS features at the outline stage, such as permeable paving, which could reduce the storage requirements within the attenuation basins. This may allow for shallower basin depths to be achieved whilst still providing the required level of attenuation and remove the need for pumping. Pumping infrastructure represents a less sustainable solution and should therefore only be proposed as a last resort.

It may also be the case that incorporating additional SuDS features, such as permeable paving, into the drainage strategy could reduce the storage requirements within the attenuation basins. This may allow for shallower basin depths to be achieved whilst still providing the required level of attenuation.

In addition, as noted above, the proposed canal corridor passes through the centre of the site. Opportunities to discharge to the canal proposals should be explored, as this may remove the requirement for pumping altogether.

Should pumping ultimately be demonstrated as necessary, the applicant must provide a more robust justification than is currently presented, including evidence that all reasonable gravity-drained alternatives have been investigated, and a specification for the pumping station should be submitted and approved at conditions stage. The applicant should also provide indicative exceedance plans for pump failure scenarios. Further information regarding pump failure events, including pump failure calculations and maintenance requirements, will be requested at condition stage.

The LLFA therefore objects on this matter until further information is provided.

RECOMMENDATION:

Object

The applicant needs to provide further information before this application can be recommended for condition. In particular, additional detail is required regarding the proposed canal corridor through the site and its interaction with both the flood risk and drainage strategies. Further justification is also required to demonstrate why the proposed pumping arrangement.

In order to overcome this objection, the applicant will need to provide:

- Further investigation into the approved canal proposals. The applicant should assess how the canal may affect flood risk both review the proposed drainage strategy. An overlay should be provided showing the relationship between the canal alignment and the proposed drainage infrastructure. The drainage design should then be revised where necessary to allow the canal
- A review of the proposed pumping arrangement. The applicant should demonstrate that all reasonable gravity-drained alternatives have been explored before relying on pumping infrastructure. Based on the information submitted to date, it is anticipated that sufficient space may be available to provide attenuation without the need for pumps, as well as investigation into the feasibility of outfalling to the proposed canal. If pumping is deemed to be the only viable option, the applicant should provide indicative exceedance plans demonstrating flow routes in the event of pump failure

Following receipt of the above information, the LLFA will review the updated proposals and provide any further comments, recommendations, or planning conditions considered necessary.

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. 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 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.