

Jonathan James
Wiltshire Council
Development Control- North
Monkton Park Offices Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref: WX/2025/139455/01-L01
Your ref: PL/2025/07551

Date: 28 November 2025

Dear Jonathan

**DEVELOPMENT OF EMPLOYMENT LAND AND BUILDINGS (CLASS B8 AND
OFFICE FACILITIES)**

OXLEAZE BUSINESS PARK, GREENHILL, ROYAL WOOTTON BASSETT

Thank you for consulting the Environmental Agency on the above application.

Environment Agency position

We **object** to the planning application, as submitted due to the following reasons;

1. Risks to groundwater.
2. Non-mains foul drainage system

We recommend that until the applicant provides adequate information to demonstrate that the risks of pollution to the water environment and the risk to groundwater can be safely/satisfactorily managed then planning permission should be refused.

Objection 1- Risk to Groundwater

We **object** to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 187 of the NPPF.

Reason

Our approach to groundwater protection is set out in [The Environment Agency's approach to groundwater protection](#). In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution are high and the groundwater asset is of high value. In this case position statement A2 and A5 applies.

Groundwater is particularly sensitive in this location because the proposed development site is within source protection zone 2c and is located upon secondary aquifer A and very shallow.

We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because it presents a risk of pollution to groundwater supplies and it is of the risk of cross-contamination due to construction.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information, and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because:

- The groundwater is vulnerable and very shallow as per flood risk assessment and drainage strategy report, Due to the site's history as landfill and brownfield land, there is a potential for contaminants to be mobilised and for pathways to be created during the construction of the proposed development.

Overcoming Objection 1

In accordance with [The Environment Agency's approach to groundwater protection](#) we will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed.

To overcome our objection the applicant should submit a **Preliminary Risk Assessment (PRA)** which includes but is not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for assumptions.

This information must demonstrate to the satisfaction of the LPA that the risks to groundwater have been fully understood and can be addressed through appropriate measures.

This is supported by our position statements outlined in [The Environment Agency's approach to groundwater protection](#) A2 - Precautionary principle and A5 - Supply of adequate information.

Objection 2 – Non mains drainage

We **object** to the proposed development as submitted because it involves the use of a non-mains foul drainage system but an inadequate assessment of the risks of pollution to the water environment has been provided by the applicant. We recommend that unless and until the applicant provides adequate information to demonstrate that the risks of pollution posed can be safely managed then planning permission should be refused.

Reason

The application form indicates that foul drainage is to be discharged to a non-mains drainage system. In these circumstances the PPG for Water Supply, Wastewater and Water Quality ref ID: 34-020-20140306 advises that applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment. In this instance inadequate information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment arising from the proposed development.

In particular, the submitted application fails to;

- address the following issues as set out Paragraph H1 of Schedule 1, Building Regulations 2010 in order to demonstrate that the proposed foul drainage system

will be designed and sited such that.

(a) it will not contaminate any watercourse, underground water or water supply. It is not clear where the discharge would be and if the watercourse referred to flows at all times.

(b) any septic tank, holding tank or cesspool is of adequate capacity and is appropriately designed. No details have been provided.

It is not clear that the General Binding Rules can be met.

Overcoming Objection 2

To overcome our objection the applicant should provide full details of the foul drainage arrangements to show the discharge location and an assessment to show how the General Binding Rules can be met in terms of the receiving watercourse.

Note to LPA

Please reconsult the Environment Agency on any documents submitted to overcome the above objections.

If you are minded to approve the application contrary to our objection, we request you contact us prior to a decision being made to allow us to make further representations.

If you have any queries regarding our response, please get in touch

Yours sincerely

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