

To:	Helena Carney	From:	James Playfair
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Planning App Ref:	PL/2025/07147
Service Ref:	Drainage
Date:	5 th January 2026

PROPOSAL

Full planning permission

Change of use of land to form overflow car park and recreational field with associated works. Change of use of public house car park to pub garden. Change of use of farm shop brewery to café and erection of extension. Change of use of part of Spa Barn (Sui Generis) to include learning and non-residential institute (Use Class F1)

SITE LOCATION

The Three Daggers and Hillside Cottage, Westbury Road, Edington, Westbury, Wiltshire, BA13 4PG

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

- Flood Risk Assessment
- Proposed Site Plan
- Site Plan as Existing

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.

The development consists of a single storey 120m² café extension to the existing farm shop and a change of use of an existing field to provide additional car parking and a multi-user games area. The new car park is proposed as grid reinforced grass. It is understood that no physical works are proposed for the land south of Westbury Road.

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.

According to the EA Flood Map for Planning part of the site is located in Flood Zone 1

The proposed development is at low risk or not at risk from all other sources of flooding.

The FRA states that a positive drainage system to the proposed building will be implemented but the applicant has not provided any details at this stage; we would advise the applicant to submit a drainage plan at this stage so as we can provide direction ahead of subsequent planning stages.

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:

- Evidence that the surface water disposal hierarchy has been applied.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Soakaway testing in accordance with BRE365, and groundwater level monitoring (taking into account seasonal variations).
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Existing pre and post development runoff rates for the site, in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- Evidence that the proposed drainage design provides a sufficient level of water treatment.

- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.
- If access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

To aid in the development of compliant drainage strategies, the following are recommended without prejudice. These are based on the [National Standards for SuDS](#). We would recommend also utilising the best practice guidance within *The SuDS Manual*, and *Getting SuDS Right from the Start*:

Standard	Best Practice Considerations
Standard 1 – Drainage Hierarchy	• Retain and enhance existing natural drainage features where possible. • Use site layout to maximize opportunities for infiltration and above-ground conveyance. • Identify how communal rainwater harvesting can be utilised to help improve viability of inclusion. • Identify whole-life cost-benefits such as water bill reductions for implementing rainwater harvesting.
Standard 2: Interception	• Use green roofs, permeable paving, rain gardens, and bioretention to maximize interception. • Distribute source control features throughout the site for maximum effectiveness. • Provide a maintenance plan to ensure interception features remain effective.
Standard 3: Management of Extreme Rainfall and Flooding	• Use topographical surveys to identify and preserve natural overland flow routes. • Design SuDS features with freeboard and overflow routes. • Ensure safe access and egress during extreme events. • Consider overland flows originating from outside redline boundary • Consider how the drainage systems will perform in the event of blockage and failure
Standard 4: Water Quality	• Use vegetated SuDS (swales, ponds, wetlands) for effective pollutant removal. • Include forebays or sediment traps upstream of main SuDS features. • Provide a maintenance plan for regular removal of silt and debris.
Standard 5: Amenity	• Use gentle side slopes, accessible paths, and seating to make SuDS features usable and attractive. • Involve local communities in the design of SuDS spaces.
Standard 6: Biodiversity	• Design SuDS to create wetland mosaics, wildlife corridors, and habitat connectivity. • Consider how SuDS can help provide wider BNG benefits / credits to the site
Standard 7: Construction, Operation, Maintenance, Decommissioning, and Structural Integrity	• Plan for safe access for maintenance. • Include decommissioning plans for temporary features.