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| <b>To:</b> | Verity Giles-Franklin | <b>From:</b> | Drainage (Barney Taylor) |
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| <b>Planning App Ref:</b> | PL/2025/09391 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 03/03/2026    |

## PROPOSAL

*Construction of new factory building (use class b2) and associated works/infrastructure (2no.silos)*

## SITE LOCATION

*Cereal Partners, Staverton, Trowbridge, BA14 6PG*

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required |          |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              | <b>x</b> |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Flood Risk Assessment and Drainage Strategy*
- *Site Plan Existing*
- *Site Plan Proposed*
- *Visualisations*

## 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.

This application relates to PL/2025/07023 that is installing additional flood resilience measures around the existing site. The site is situated adjacent to the Weston Cut, a main river.

The site is in Flood Zone 2 & 3. The applicant has undertaken flood zone modelling that has been approved by the EA. The modelling demonstrates that the design flood event remains in the channel, without flooding the site. Additional flood mitigation is proposed, with raised kerbs and 300mm raised FFLs.

It is proposed that surface water drainage will connect into the existing drainage network at the brownfield site, ensuring no additional outfall is required. An additional attenuation tank will be constructed.

The applicant is proposing to discharge at 22l/s, providing 30% betterment on the 1 in 1 year pre-development brownfield runoff event.

**RECOMMENDATION: no objection subject to the following conditions**

1. The applicant must provide further information related to the surface water drainage strategy:
  - The applicant must confirm the existing surface water discharge rate into the Weston Cut for the whole site. The LLFA would not expect the discharge rate to increase post-development ([Standard 1: runoff destinations](#) & [Microsoft Word - Betterment Strategy June 2024 - FINAL v2](#)).
  - The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with Standard 4 of the National Standards for SuDS ([Standard 4: water quality](#)).
  - In accordance with Standard 3 of the National Standards for SuDS, overland exceedance routes are to be identified and shown on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate no adverse flood risk to the development of elsewhere ([Standard 3: management of extreme rainfall and flooding](#)).
  - We note the applicant has provided some details related to maintenance in Section 10 of the FRA and DS, however the applicant must provide clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development ([Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

## INFORMATIVES

An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, **the discharge rate from the site must be agreed with Wiltshire Council** as part of agreeing the surface water drainage strategy for the site

## 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.