

To:	Peter Crozier	From:	Drainage Team
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Planning App Ref:	PL/2025/09205
Service Ref:	Drainage
Date:	09/03/2026

PROPOSAL

Retrospective application for the storage of up to 72 personal storage units on the former car park area of Cooper Tyres.

SITE LOCATION

Land off Scotland Road, Scotland Road, Melksham, SN12 8AJ

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Flood Risk Assessment
- Location Plan
- Planning Design & Access Statement 2

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.

The proposal is to reuse the former Cooper Tires yard on Scotland Road as a 72-unit self-storage container site, where 20 units are already in place and the remaining 52 will be added, all positioned on the existing tarmac hardstanding without any new surfacing, groundworks or drainage alterations.

The site remains exactly as it was pre-development fully impermeable, previously used for parking and storage, and already served by a positive surface-water drainage system consisting of an existing road gully that drains into the highway drain and ultimately the River Avon along the eastern boundary. The Flood Risk Assessment confirms that the drainage network, run-off routes, volumes and peak rates remain identical before and after development, since no changes are made to the ground levels, impermeable area or discharge points. Surface water will continue to flow toward the existing low point and be captured by the same gully, and in extreme rainfall or exceedance, overland flow will follow the natural topography toward the river exactly as it does now. Containers will sit on block pads, allowing water to move beneath them and improving their resilience to minor ponding without altering drainage. It also recommends implementing a flood warning or evacuation plan as part of site operations.

RECOMMENDATION

No objection subject to the following conditions

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

Within 3 months of the date of this permission, the applicant shall also provide the following supporting information for approval:

- The applicant must provide verified evidence of the existing road gully outfall location such as a CCTV survey or drainage tracing as the FRA currently only assumes its discharge route and states that the outfall has not been confirmed.
- We note pre-development overland flow arrows for the have been provided, in the event flows cannot pass beneath the containers, the applicant must provide a post-development exceedance flow plan demonstrating how surface water will route around and between the storage containers during extreme rainfall events
- The applicant should provide a Pollution Prevention/Water-Quality statement to confirm how spills or polluting materials will be managed, as no pollution-control details have been submitted and the site drains toward the River Avon.

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.

Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

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.