

To:	Alex Edge	From:	Drainage
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Planning App Ref:	PL/2026/00638
Service Ref:	Drainage
Date:	11/03/2026

PROPOSAL

Full planning permission for replacement of existing light industrial unit with new two storey light industrial unit and external landscaping.

SITE LOCATION

41B Main Street, West Wilts Trading Estate, Westbury, BA13 4JU

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

- Application Form
- Design and access statement
- Existing Site Plan
- EA Flood map
- Existing Building Elevations
- Existing Site and Location Plan
- Existing Site Elevations
- Preliminary Ecological Appraisal and Roost Assessment
- Proposed Elevations
- Proposed Floor & Roof Plans
- Proposed Site and Location Plan
- Proposed Site Elevations
- Proposed Site Plan
- Surface Water Drainage Strategy Report

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.

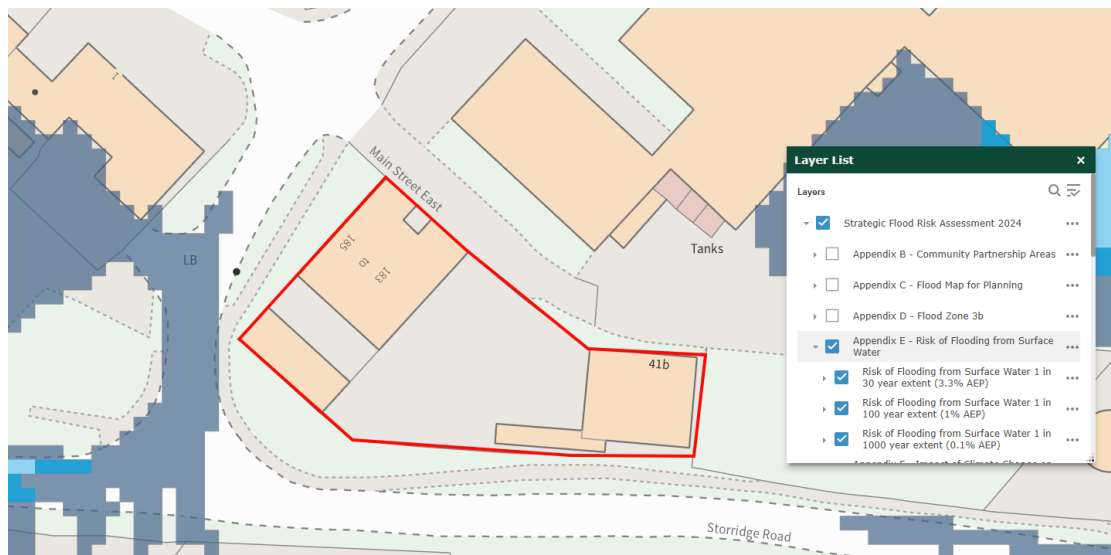
Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

Assessment

The application has not 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 other documents and we do not take any responsibility for incorrect data or interpretation made by the authors. The developer, or agent working on their behalf, retains the responsibility for the checking of the design, calculations and details contained in the additional submitted information.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), indicates that the site is located within Flood Zone 3a and has a high level of risk from fluvial flooding. The applicant's Surface Water Drainage Strategy states that they have deemed the site to fall within Flood Zone 1. The most recent EA flood mapping supports this, so we accept that the site can be considered to fall within Flood Zone 1.

The site has a low level of risk from surface water flooding and a small portion along west direction of the road located in front of the site falling within the 1 in 1000-year flood extent.



The site has a low level of risk from ground water flooding.

The applicant has not clarified the existing drainage arrangement on the site, although they have identified the presence of an existing surface water sewer in the vicinity. Their proposal includes replacing the existing hardstanding car park with permeable paving where feasible, however these exact areas have not been confirmed. Runoff from the replacement units will be managed via an infiltration trench located within the car park. The trench is proposed to be unlined to enable infiltration, with an overflow connection provided to the existing surface water sewer.

The applicant has provided indicative sizing of the required storage volume within this trench, but this will need to be refined based on an agreed discharge rate to the sewer, and the results of BRE365 soakaway testing. The maximum allowable discharge from the site must be in accordance with Wiltshire Council's betterment policy update for brownfield sites, which can be found [here](#).

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:

In order to discharge the above drainage condition the following additional information must be provided:

- Existing brownfield runoff rates for the site.
- Post development runoff rates. These must be in accordance with Wiltshire Council's betterment policy update for brownfield sites, which can be found [here](#).
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Updated calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- A clear drainage layout that details all proposed pipes, manholes, and attenuation/ SuDS features including clarification of which areas will be replaced with permeable paving.
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever it is practicable as part of the surface water drainage strategy.
- 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 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.