

To:	Joe Richardson	From:	Drainage Team
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Planning App Ref:	PL/2026/01038
Service Ref:	Drainage
Date:	03/06/2026

PROPOSAL

Change of use of part of the commercial yard from Sui Generis (car spares) to a self-storage facility, including the installation of 118 storage containers, widening of the site access, and the erection of security fencing with associated works

SITE LOCATION

Langfords Car Spares, Semley, Shaftesbury, SP7 9AQ

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
- Drainage Survey
- Drainage Strategy Report
- Location Plan
- Flood Risk Assessment
- Covering Letter & Planning Statement
- Surface Water Drainage Strategy
- Existing Site Plan
- Proposed Site Plan
- Maintenance Schedule
- Contamination Statement

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 FRA identifies that there is no significant fluvial, tidal, groundwater, sewer, or reservoir flood risk, however it highlights the presence of a surface water flow path through the site, associated with an existing ditch running northwards.

The proposal involves changing the current use of the site from storing and dismantling cars for spare parts to a facility where metal containers will be installed for self-storage use. To support this change, the access will be widened to 6.5 metres to improve entry and exit.

Surface water runoff will permeate through the unsealed road surface and be collected via trench drains, then conveyed through perforated pipework to an attenuation tank before discharge to the existing ditch at a restricted rate of 2.0 l/s (Qbar). The system is fully separated from the ground using an impermeable liner. There is no evidence to demonstrate betterment or confirm that the receiving ditch has adequate capacity. The existing site drains informally via a combination of partial infiltration, overland flow, and limited connections to the ditch system, ultimately discharging to the same receiving watercourse (Drainage Strategy Report Section 2.3). However, no quantification of existing runoff rates has been provided, and therefore it is unclear whether the proposed controlled discharge will achieve betterment over the current situation.

Although trial pits show shallow groundwater and poor infiltration potential (Trail Pit near S10), no BRE 365-compliant infiltration testing has been submitted to robustly justify the exclusion of infiltration in accordance with the SuDS hierarchy. Also, while contamination risks are controlled operationally, no SuDS-compliant water quality treatment strategy has been provided to demonstrate that surface water runoff will be appropriately treated prior to discharge.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information, particularly regarding the capacity of the existing ditch to receive flows. Further details are required to confirm that discharge can be accommodated without increasing flood risk.

- The applicant is required to provide a comparison between existing and proposed runoff rates, including a clear demonstration of whether the proposed drainage strategy delivers betterment over current site conditions. In particular, the design should demonstrate a minimum 30% betterment against greenfield runoff rates for the 1 in 1 year, 1 in 30 year, and 1 in 100 year plus climate change events. A robust justification must also be provided for the proposed discharge rate of 2.0 l/s (Qbar).
- The applicant must provide a clear justification for the use of below-ground attenuation, demonstrating that blue/green SuDS features (such as swales, basins and rain gardens) have been fully considered in line with best practice and discounted only where demonstrably unfeasible.
- Although trial pits indicate shallow groundwater and limited infiltration potential, no BRE 365 compliant infiltration testing has been provided, and therefore, sufficient evidence has been submitted to justify the exclusion of infiltration in accordance with the [surface water disposal hierarchy](#) set out in the National Standards for SuDS. Further site-specific infiltration testing, undertaken in accordance with BRE 365, is required to robustly demonstrate that infiltration is not a feasible drainage option.
- The applicant should provide a detailed drawing and sizing of the existing and proposed impermeable areas across the site, and clarify how the introduction of an impermeable liner will alter the hydrological behaviour of the site and impact runoff generation.
- The applicant should provide evidence to demonstrate that the receiving ditch has sufficient capacity to accommodate the proposed discharge without increasing flood risk elsewhere, supported by appropriate hydraulic assessment.
- We note that the Drainage Survey document includes drawings showing the existing overland flow routes and current flow paths across the site. The applicant should provide both pre- and post-development exceedance (overland) flow routing plans, clearly demonstrating how flows will be safely managed during extreme events. These proposals must show that flood risk is appropriately mitigated both on-site and to surrounding receptors, particularly the dwellings to the north of the site, ensuring no increased risk to people or property and that flows are directed and contained safely.
- The applicant must demonstrate how the proposed development will maintain, accommodate, or improve surface water flow route and confirm that the development will not obstruct, redirect, or exacerbate surface water flood risk either on-site or to neighbouring areas.
- A SuDS-compliant water quality treatment strategy should be provided in line with the CIRIA SuDS Manual (C753) and [Standard 4](#) of the National Standards for SuDS, identifying potential pollutants associated with the site use and demonstrating how runoff will be appropriately treated prior to discharge.
- Confirm that appropriate consent or legal agreement is in place to discharge surface water into the receiving ditch.

INFORMATIVES

- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

- 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.