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Planning App Ref:	PL/2026/02926
Service Ref:	Drainage
Date:	27/05/2026

PROPOSAL

Proposed warehouse extension to Unit 19c with associated works

SITE LOCATION

Unit 19c, Dunkirk Business Park, Frome Road, Southwick, Trowbridge, BA14 9NL

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
- Location Plan
- Existing Site Plan
- Existing Floor Plan & Elevations\
- Proposed Site Plan
- Proposed Floor Plan & Elevations
- Design and access statement
- Drainage Strategy
- Flood Risk Assessment

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.

As per FRA the site is located within Flood Zone 1, indicating a low probability of fluvial flooding. The assessment also identifies a negligible risk of groundwater flooding and surface water flooding. However, there is risk of localised surface water flooding within the ditch which forms the western boundary of the site.

The proposal is for extension of existing warehouse. The application site area is 0.69ha and the proposed single storey extension will increase the quantum of floor space from 825 sqm (GIA) to 1,968 sqm (GIA) i.e. a net increase in 1,143 sqm GIA.

The applicant has proposed a new drainage system for the extension, built upon the existing industrial unit drainage design, utilising the current infrastructure. Roof drainage will discharge via rainwater pipes into a new private surface water network, while gullies at low points will collect runoff from hardstanding areas. Surface water will be directed to a new geocellular storage tank for attenuation, with flows controlled by a hydrobrake device to achieve a 30% betterment on the greenfield QBAR rate of 1.1 l/s, prior to discharge into the existing attenuation tank serving the existing building.

4.5m³ of surface water flooding is expected in the 1% AEP rainfall event with a 40% allowance for climate change. It is proposed to direct the exceedance flow to the north-eastern corner of the site where inundation will be retained by a HB2 kerb and drained away by the double gullies post rainfall event.

RECOMMENDATION

No objection subject to the following conditions

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, Non Statutory Technical Standards for SuDS and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.**

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

- It is noted that the applicant plans to restrict discharge rates from the site to 1.1l/s for all events up to the 1 in 100year + climate change storm. It is acknowledged that this will provide betterment, however this will not provide 30% betterment for the 1 in 1 year rainfall event. Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 30% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."

The applicant is required to resubmit calculations which demonstrate that the required 30% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events.

- A detailed cross section drawings for the proposed geocellular attenuation tank in accordance with the sizing calculations.
- The applicant must justify why further blue/green, source-control SuDS are not feasible at this site, with particular regard to rainwater harvesting (RWH). Further source-control SuDS would contribute to several multi-faceted benefits, notably in water quality and quantity, interception and amenity.
- It's noted in the flood exceedance drawing that overland flow travels along the western boundary. The applicant must outline how flow does not exceed across the boundary towards neighbouring property.

The applicant must also add flow routes across the extent of the site (within the red line boundary), not just the western area.

- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

INFORMATIVES

- 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 practicable as part of the surface water drainage strategy.
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- 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.
- If the downstream outfall to the watercourse will be altered, the applicant must gain land drainage consent.

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.