

To:	Gen Collins	From:	Rahul Dixit
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Planning App Ref:	PL/2026/03375
Service Ref:	Drainage
Date:	29/06/2026

PROPOSAL

Outline application for the demolition of number 5 and 6 Storridge Road and the erection of up to 165 dwellings (including affordable housing), with public open space, structural planting, landscaping, and sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access.

SITE LOCATION

Land off Storridge Road, Westbury, BA13 4HX

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

- Location Plan
- Application Form
- Cover Letter and Notices
- Design and Access Statement Combined
- Flood Risk Assessment
- Foul Drainage Analysis
- Proposed Access Statement
- Development Framework Plan

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.

Relevant Planning History:

17/12342/OUT – Refused – Outline planning application for the demolition of number 13 and 14 Storridge Road and erection of up to 200 dwellings

19/06389/OUT – Refused – Outline planning application for the demolition of number 13 and 14 Storridge Road and erection of up to 190 dwellings

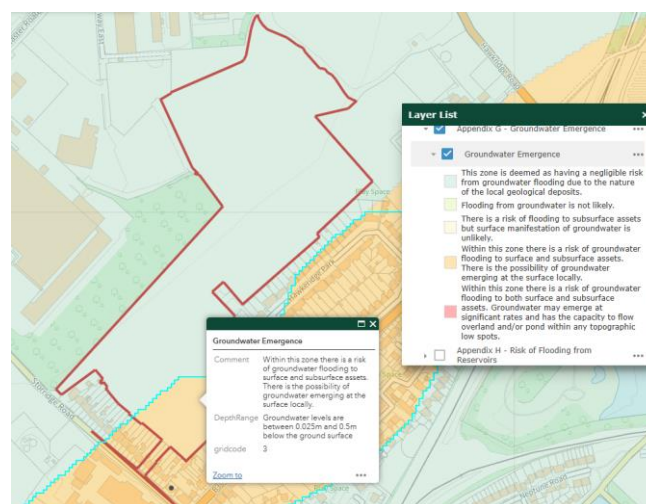
PL/2022/09842 – Refused – Outline planning application for the demolition of number 13 and 14 Storridge Road and erection of up to 200 dwellings

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.

According to the Flood Risk Assessment (FRA), the site is located within Flood Zone 1 and is at low risk of fluvial and pluvial flooding. There is a smaller area abutting the northwest boundary which has medium risk of surface water flooding, but this is outside the developed area.

The SFRA indicates that a portion of the southern site area along with the access may be at risk, with groundwater levels between 0.025 m and 0.5 m below ground surface, although this should be confirmed through site specific Ground Investigations.



At this stage, detailed layout plans for the proposed development have not been provided. The submitted information is limited to the indicative boundary of the residential development area, along with the proposed internal road network and site access arrangements.

Ground levels across the proposed development site generally fall towards the north-east, where an existing ditch network and a piped outfall connect to the wider industrial estate drainage system. The applicant proposes a surface water drainage strategy whereby runoff will be conveyed to an attenuation basin located in the north-western area of the site. From this basin, flows will be discharged at a controlled rate of 12.88 l/s to an existing ditch outfall in the same locality, ultimately draining to Biss Brook. The proposed discharge rate represents a 20% betterment over the greenfield runoff rate for the 1 in 1-year rainfall event. However, as per Wiltshire Council requirements post development discharges must provide 30% betterment over predevelopment discharges for both peak flow and volume.

Infiltration as a means of discharge has been discounted due to the presence of clay soils in the lower northern part of the site, as identified in the Geoenvironmental Assessment, which are considered unsuitable for infiltration-based drainage solutions.

However, no detailed drainage layout plan along with the relevant hydraulic calculation has been provided to support this application.

The applicant has also proposed to set finished floor levels at a minimum of 0.15 m above proposed external ground level to mitigate the risk of flooding to properties.

The provided FRA outlines which party is to be responsible for managing and maintaining the private drainage system. However, the applicant has not provided proposed management and maintenance requirements for the proposed drainage (including proposed attenuation pond).

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:

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- The applicant's detailed drainage strategy must 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 100-year return period storm events including relevant climate change factor.
- Surface water drainage strategy demonstrating that:
 - The 1 in 30-year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 years plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
 - The site has been designed to ensure that flows in excess of the 1 in 100-year rainfall event are managed in exceedance routes that minimise the risks to people and property.
- A detailed surface water drainage model prepared using Causeway Flow (MicroDrainage or other agreed industry-standard software) shall be provided Due to the scale of the proposed development. This will enable better technical review and provide a clearer understanding of the proposed drainage strategy.
- In accordance with [Standard 1](#) of the National Standards for SuDS, rainwater harvesting should be considered as part of the drainage strategy. The applicant must demonstrate this is reflected in the submitted drainage strategy drawings and overall plan.
- The site layout does not demonstrate that interception storage has been considered in accordance with [Standard 2](#) of the National Standards for Suds. The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- In accordance with [Standard 4](#) of the National Standards for Sustainable Drainage Systems, the applicant shall incorporate SuDS source control measures to manage surface water and water quality throughout the treatment train, avoiding reliance on large attenuation features near discharge points. A pollution hazard assessment shall be submitted demonstrating, using the CIRIA C753 Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3), that appropriate treatment stages are provided (minimum two for high-risk areas and one for low-risk areas), with supporting calculations and plans confirming compliance.
- A post-development exceedance flow plans demonstrating that flood risk is not increased on site or elsewhere as a result of the development. The plans shall be supported by existing and proposed site topographical levels to clearly show overland flow paths, and exceedance routing.
- The applicant should demonstrate that they hold riparian rights for the receiving ditch. Where this cannot be demonstrated, consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Following the removal of the holding objection, the drainage team require the applicant to provide the following information – this can be handled via condition

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.

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

- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at 150mm height above the SW drainage cover levels.
- Confirmation from Wessex water that they will adopt the proposed drainage systems that is being offered for adoption.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H
- The applicant stated that maintaining elements of the drainage strategy may be the responsibility of individual plot owners. The applicant must ensure the drainage strategy, and a copy of the detailed maintenance regime, is included in the title deeds of each property.
- 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.

- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.
- 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.