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Planning App Ref:	PL/2026/02565
Service Ref:	Drainage
Date:	16 July 2026

PROPOSAL

Full planning permission

Change of use of land formerly in agricultural use for commercial purposes together with the removal of temporary buildings

SITE LOCATION

Unit 6 Yard, Chelworth Lodge, Cricklade, SN6 6HP

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

- Flood Risk Assessment (May 2025)

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.

The development at the site is the retrospective planning permission for the change of use of agricultural land for commercial purposes, including the erection of a storage container, shipping container and portacabin.

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 site forms part of an industrial estate on the southern side of Waterhay Road. The site is to the south of the existing industrial estate. A watercourse forms the northern boundary of the site and there is agricultural land to the east, south and west of the site. The site has an access from the existing industrial estate over the watercourse. The area of the development is 0.65 hectares.

The site is partly located within Flood Zone 3

It is proposed that surface water within the parking areas and undeveloped areas will infiltrate. The runoff from the roof of the structures and the access routes will enter a filter drain. The drain will discharge to a basin at the northwestern part of the site which is within FZ3.

The FRA states in Section 5.1 that 'during the design life of the development it is anticipated that the potential flood depths in the areas at risk would increase' No mitigation proposal have been proposed to address this which would be a requirement of the proposed SW drainage plan.

The basin will facilitate infiltration but will also have a controlled outlet to the adjacent watercourse should adequate infiltration rates not be achieved

The maximum discharge rate from the basin during the 1% annual probability (1 in 100 chance each year) event with 40% climate change is 5.2l/s. This is higher than all greenfield runoff rates provided in Table 5.

The FRA concludes

"It is recommended that as a Condition of an approval there is a requirement to:

- formalises the areas designated as access routes within the site;*
- undertakes a topographic survey of the site;*
- completes infiltration testing of the site; and*
- prepares a detailed design for the management of surface water."*

The LLFA view that insufficient information has been provided as part of this full planning application

RECOMMENDATION

Object for the following reason(s):

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information that cannot be supplied under condition.

The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

The developer should provide the following information as part of future planning applications in accordance with the [National Standards for SuDS](#):

Standard 1: runoff destinations

- Post development runoff rates. **These must also be in accordance with Wiltshire Council's betterment policy** update, 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.

Standard 3: management of extreme rainfall and flooding

- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- All proposed drainage features are outside Flood Zones 2 and 3 and where they are adjacent to an ordinary watercourse, they are not located within the EA surface water flood maps. **Where drainage features are located adjacent to flood zones 2 and 3, they must be above the 1 in 100 year plus climate change flood level. This information can be provided by the EA.**
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks. A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- 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.
- A plan showing the cross sections and design of any attenuation pond and its components.

- **Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.**
- Groundwater level monitoring (taking into account seasonal variations).
- The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption of infiltration drainage features.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.
- The access to the site is predicted to flood and therefore an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

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.