

To:	Peter Crozier	From:	Drainage Team
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Planning App Ref:	PL/2025/09205
Service Ref:	Drainage
Date:	21/08/2026

PROPOSAL

Retrospective application for the storage of up to 72 personal storage units on the former car park area of Cooper Tyres.

SITE LOCATION

Land off Scotland Road, Scotland Road, Melksham, SN12 8AJ

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	X
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form (*Mar 2026*)
- Flood Risk Assessment (*Mar 2026*)
- Location Plan (*Mar 2026*)
- Planning Design & Access Statement 2 (*Mar 2026*)
- 5795C1 Scotland Road CCTV Report (*Aug 2026*)
- 5795C1 Scotland Road Outcome Report (*Aug 2026*)
- D2424 TN02- Response to EA Comments (*Aug 2026*)
- Elevations (*Aug 2026*)
- ENC 110526-5795C1 Scotland Road CCTV Plot 1 (*Aug 2026*)
- Revised layout post EA comments (*Aug 2026*)

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

We acknowledge that this is a re-consulted application supported by additional drainage and flood risk information, including a CCTV drainage survey, revised site layout, updated flood risk assessment information and a technical note prepared in response to the Environment Agency's previous comments.

The additional flood risk assessment work demonstrates that the site remains outside the predicted flood extents for the assessed flood events, including the climate change and exceedance scenarios considered within the supporting technical note. Furthermore, the storage containers are shown to be elevated by 600mm above ground level on block pads, allowing any potential floodwaters to pass beneath the structures and reducing the potential for obstruction of flood flow routes. The revised site layout also demonstrates that an 8m easement is maintained adjacent to the River Avon. As such, the LLFA is satisfied that the previously requested exceedance routing information has been adequately addressed.

With regard to water quality, whilst a standalone Pollution Prevention or Water Quality Statement has not been submitted, the proposed development comprises the retention and use of an existing hardstanding area for storage containers and does not introduce any new drainage infrastructure, industrial processes or significant sources of contamination. On this basis and having regard to the nature of the development proposed, the LLFA raises no further concerns regarding surface water quality management.

Accordingly, the Lead Local Flood Authority is satisfied that the information submitted adequately addresses the drainage matters raised within our previous consultation response and therefore raises **no objection** to the proposal.

RECOMMENDATION

No Objection for the following reasons

The LLFA has reviewed the additional information submitted and is satisfied that the drainage matters previously raised have been adequately addressed. Therefore, the LLFA raises no objection to the application.

INFORMATIVES

- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, **the discharge rate from the site must be agreed with Wiltshire Council** as part of agreeing the surface water drainage strategy for the site.

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.