

Wiltshire Council Planning Consultation Response

13 December 2024

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Joe Richardson

Application No: PL/2024/09976
Outline Planning Permission: Some matters reserved
Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments
Land off Southampton Road and Junction Road, Alderbury, Wiltshire

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

☐	No Comment
☐	Support
☐	Support subject to conditions (please set out below)
☒	Object (for reasons set out below)
☐	No objections

Matters Considered:

Documents Reviewed:

- Application Form
- Air Quality Assessment
- Covering Letter
- Flood Risk Assessment and Drainage Strategy
- Design and Access Statement- Part 1
- Design and Access Statement- Part 2
- Energy and Sustainability Statement
- Biodiversity Net Gain Assessment
- Existing Block Plan
- Existing Site Plan
- Landscape and Visual Appraisal - Appendix A
- Landscape and Visual Appraisal - Appendix B
- Landscape and Visual Appraisal
- Noise Impact Assessment
- Phase I Geo-Environmental Desk Study
- Planning Statement
- Preliminary Ecological Appraisal
- Proposed Site Plan
- Proposed Sketch Section through Plot Frontage and POS Area
- Soft Landscape Strategy-01

- Soft Landscape Strategy-02
- Soft Landscape Strategy-03
- Soft Landscape Strategy-04

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 is located within Flood Zone 1 and generally has a low risk of surface water and ground water flooding. There is a surface water flow path running through the site, which has not been considered as part of the FRA. The topographic survey for the site, and the SFRA mapping, indicate that surface water runoff from the site gathers in a topographic depression within the site and is channeled to the east. This is contrary to statements made in the drainage strategy, stating that surface water runoff from the site is currently captured by a drainage ditch on the northern boundary. It is accepted that there are no surface water sewers in the vicinity of the site and that discharging to this drainage ditch is in line with the discharge hierarchy. However, given that the site does not fall within the existing catchment of the drainage ditch, we would expect the applicant to carry out a capacity assessment of the ditch, and any downstream drainage infrastructure, to ensure that the discharge from the site can be accommodated.

The applicant is proposing to discharge to the ditch on the northern boundary, via two separate outfalls. Wiltshire Council requires post development discharges from greenfield sites to provide 30% betterment over pre-development discharges for all storm events between the 1 in 1 year and 1 in 100 year return period events. However, the applicant is proposing to discharge at a rate higher than existing greenfield rates due to the limitations on flow control devices. In the LLFA's experience, restricted discharge rates as low as 1l/s can be achieved with appropriate maintenance. Restricting to 1l/s at both outfalls would likely ensure that post-development discharges from the site were not increased as a result of the development.

Objections:

The drainage team in their capacity as Lead Local Flood Authority have the below objections to the application; these must be overcome before a drainage objection can be removed:

1. The applicant should undertake a capacity assessment of the drainage ditch and any downstream drainage infrastructure to demonstrate that flows from the proposed development can be accommodated without increasing flood risk elsewhere.
2. The applicant should submit a drainage strategy that demonstrates that post-development discharges provide 30% betterment over pre-development discharges for all storm events between the 1 in 1 year and 1 in 100 year return period events in line with Wiltshire Council's betterment policy. Where this is not practically achievable, we expect flow control devices to be restricted to 1l/s as a minimum.

Informatives:

- The applicant should note that if the intention is to offer the roads for adoption, the LLFA does not provide for the approval of drainage suitable for adoption by the Highway Authority. Further approval should be ascertained from the Highway Authority.
To find out more about the processes required to secure road adoption, contact the Highway Authority at HighwaysDevelopment@wiltshire.gov.uk.
- 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](#).

The table below stipulates the information typically required at each application stage. Provision of the correct information will expedite the processing of applications by the drainage team.

Pre-app	Outline	Full	Reserved matters	Discharge of conditions	Document to be submitted
✓	✓	✓			Flood Risk Assessment / Statement
✓	✓	✓			Drainage Strategy / Statement & sketch layout plan
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of third party agreement for discharge to their system (in principle/ consent to discharge)
		✓		✓	Maintenance program and on-going maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full Structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration results
		✓	✓	✓	Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters
		✓	✓	✓	Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change
		✓	✓	✓	Detailed landscaping details
		✓	✓	✓	Discharge agreements (temporary and permanent)
		✓	✓	✓	Development Management & Construction Phasing Plan

Shilpy Das (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.