

Wiltshire Council Planning Consultation Response

13 March 2025

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 (Dec24)
- Covering Letter (Dec24)
- Flood Risk Assessment and Drainage Strategy (Dec24)
- Design and Access Statement- Part 1 (Dec24)
- Design and Access Statement- Part 2 (Dec24)
- Existing Block Plan (Dec24)
- Existing Site Plan (Dec24)
- Landscape and Visual Appraisal - Appendix A (Dec24)
- Landscape and Visual Appraisal - Appendix B (Dec24)
- Phase I Geo-Environmental Desk Study (Dec24)
- Planning Statement (Dec24)
- Proposed Site Plan (Dec24)
- Topographic Survey (Dec24)
- Soft Landscape Strategy-01 (Dec24)
- Soft Landscape Strategy-02 (Dec24)
- Soft Landscape Strategy-03 (Dec24)
- Soft Landscape Strategy-04 (Dec24)
- Agent's response to Drainage Comments (Feb25)
- Drainage Strategy (Feb25)
- Surface Water Flood Map (Feb25)
- Topographic Survey – Appendix D (Feb25)
- Email from Agent Re Drainage (Mar 25)
- Drainage Strategy (Mar 25)
- Appendix I – Greenfield Run-Off Rate (Mar 25)
- Existing Drainage Catchment Area (Mar 25)

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 in flood zone 1 and has a low risk of groundwater flooding and risk of surface water flooding of 1 in 1000.

The LLFA previously objected to this application on the basis that the SFRA flood mapping and topographic survey indicate that the site does not fall within the natural drainage catchment of the northern ditch (the proposed discharge location), and that the development would therefore increase surface water flows to this ditch. It was requested that the applicant either provides a catchment plan that demonstrates no catchment transfer or undertakes a capacity assessment of the northern ditch and any downstream drainage infrastructure to ensure that these increased flows can be accommodated.

The applicant has provided a catchment plan that shows that approximately 60% of the development site is not within the existing catchment of the northern ditch and instead falls towards Junction Road. This means that the development does result in catchment transfer, and the applicant will need to demonstrate that all practicable steps are being taken to provide betterment over greenfield rates. Where this cannot be achieved due to limitations on flow restrictions, the applicant will need to demonstrate that this ditch, and any downstream drainage infrastructure (culverts), have sufficient capacity to manage additional flows. It is not accepted that 'low flows' negate the need for any assessment.

The applicant has provided calculations that detail the greenfield rates from the existing catchment currently draining to the northern ditch. This Qbar greenfield rate is 0.76l/s. It is accepted that flow controls are limited to 1l/s, but the applicant is proposing multiple outfalls, leading to a total discharge of 2l/s. This is a 260% increase over the Qbar rate. We would expect the total discharge to the ditch to be limited as low as practicably possible, to 1l/s.

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:
 - a) Update the drainage strategy to ensure total discharge to the northern ditch is limited as low as practicably possible, to limit additional flows above existing greenfield rates.
 - b) Demonstrate that the northern ditch and any downstream drainage infrastructure (culverts), have sufficient capacity to manage additional flows resulting from the development.

Conditions:

Following the removal of the drainage objection to the outline application, the drainage team have the following conditions which need to be addressed by the applicant as part of subsequent applications:

- 1. No development shall take place until surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the Non Statutory Technical 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:

- Evidence that the impact upon existing drainage systems is mitigated by discharging the flow throughout the management train rather than relying upon a single point of discharge.
- SuDS source control measures to manage water quantity and maintain water quality have been implemented wherever possible and throughout the management train so the development is not reliant upon large attenuation features close to the points of discharge.
- SuDS have been selected to provide a wide range of benefits including amenity, biodiversity and maintaining water quality.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Calculations that demonstrate:
 - 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 year 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 sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.
- Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property
- Detailed cross section drawings and engineering details for any conveyance, infiltration or attenuation SuDS features.

2. No development shall take place until ground investigations, including soakaway testing in accordance with BRE 365, have been carried out on site, and evidence has been provided to demonstrate that the results of these investigations have been considered in the drainage design which has been submitted to and approved by the local planning authority.

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

- Evidence of ground investigations that determine groundwater levels across the site, accounting for seasonal variation.
- Evidence of soakaway testing, in accordance with BRE365 guidance, to formally discount infiltration as a viable discharge option.
- Evidence that the results of these investigations have been considered in the drainage design.

3. No development hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details.

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

- Clear arrangements for the ownership and ongoing maintenance of the SuDS over the lifetime of the development.
- A construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

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](#).

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

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

Abhishek Nandan (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.