

Wiltshire Council Planning Consultation Response

15 September 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

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Application No: **PL/2025/05762**
Full planning permission
Mixed-use commercial development including a convenience/food retail unit, a drive-through coffee unit, two B8 units with ancillary office use, and the retention of an existing B8 warehouse, along with associated parking, access, and servicing arrangements.
Armishaw Removals, Netherhampton Road, Netherhampton, Salisbury, SP2 8RA

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:

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

Matters Considered:

Documents Reviewed:

- Application Form (Aug 2025)
- Design & Access Statement (Aug 2025)
- Planning Statement (Aug 2025)
- Proposed Elevations (Aug 2025)
- Proposed Floor Plans (Aug 2025)
- Existing Site Block Plans (Aug 2025)
- Proposed Block Plans (Aug 2025)
- Proposed Landscape Plan (Aug 2025)
- Proposed Roof Plans (Aug 2025)
- Flood Risk Assessment (Sep 2025)

We note that the applicant has submitted an additional document, a Flood Risk Assessment (FRA). However, the FRA only addresses pluvial and fluvial flood risks. The Strategic Flood Risk Assessment (SFRA) mapping clearly indicates that the development site is also at high risk of groundwater flooding, which has not been adequately considered (see Figure 1)

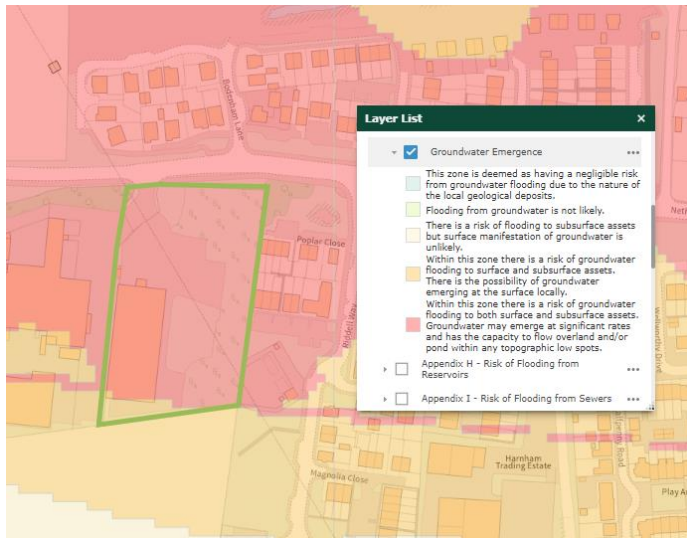


Figure 1 – SFRA groundwater flood risk

The applicant will also be required to prepare and submit a surface water drainage strategy for the site. The LLFA cannot support this application before an FRA and drainage strategy are submitted and we recommend that other layout plans are not approved before a drainage strategy has been considered, as this may result in changes to the site layout.

We note from the submitted plans the inclusion of green roofs, the LLFA supports the integration of green roofs as part of the surface management strategy, and we would expect these to be carried forward into the proposed drainage strategy

Therefore, the LLFA cannot remove the objection from the previous consultation.

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) **An updated site-specific Flood Risk Assessment (FRA) is required for this application. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, especially from groundwater, and how the flood risk from all sources will be managed without increasing flood risk to the development itself or elsewhere.**
- 2) **A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the [National Standards for SuDS](#):**

Drainage Strategy should include the following information:

- Evidence that SuDS have been selected, wherever possible, to provide a wide range of benefits including amenity, biodiversity and maintaining water quality (in line with National SuDS Standards 2-6).
- Evidence that 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.
- Existing greenfield runoff rates for the site.
- Post development runoff rates in accordance with Wiltshire Council's betterment policy:
 - *For brownfield sites, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall even.*
- Evidence demonstrating how the surface water disposal hierarchy has been applied and how all other options have been exhausted. The hierarchy is set out below (as per the Sewerage Sector Guidance, paragraph C.3.12, and National SuDS Standard 1):
 - Surface water runoff is collected for use.

- Discharge into the ground via infiltration.
- Discharge to a watercourse or other surface water body.
- Discharge to surface water sewer or other drainage system, discharging to a watercourse or other surface water body.
- Discharge to a combined sewer.
- The drainage strategy does not increase flood risk, as a result of catchment transfer.
- A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented.
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Surface water can be safely managed within the proposed development, up to and including a 1 in 100 year plus climate change event.
- Existing flood flow routes through the site have been maintained, or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Measures to prevent pollution of the receiving groundwater and/or watercourses.
- 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.

Ground Investigations

- 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.

Detailed Drainage calculations

- 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.
- Hydraulic Models should set the MADD factor / additional storage volume factor to 0m³ / ha in order to prevent an overestimation of storage capacity in the proposed drainage network.
- If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.
- Demonstration via calculation / relation of areas to the National SuDS Standards that the first 5mm of rainfall across the site is fully intercepted (National SuDS Standard 2)

Design Drawings

- A plan showing the cross sections and design of any attenuation pond and its components.
- Drawings showing conveyance routes for exceedance flows that minimise the risk to people and property in line with National SuDS Standard 3.

Third party consent

- Consent for any outfalls from the proposed surface water and foul water drainage systems into a public sewer or other drainage system not owned by the applicant.

Ownership and Management

- 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

Construction

- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- A construction management plan.

Informatives

- All new drainage will need to comply with Building Regulations Part.
- Connection to the public sewer network will require approval from Wessex Water under Section 106 of the Water Industry Act 1991.

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