

To: Development Management

From: Drainage Team Rohit Singh

Planning App Ref: PL/2025/08842 Service Ref: LLFA

Date: 17/11/2025

PROPOSAL

A residential-led development for up to 310 new homes, 40% of which would be affordable. Additionally, the Proposed Development would deliver an early years nursery school, community facilities, and a Strategic Alternative Natural Greenspace ('SANG'). A new vehicular access by a 4-arm roundabout is also proposed off Coombe Road.

Land South of Harnham and West of Coombe Road, Salisbury

SITE LOCATION

Based on the attached EIA Scoping Report, the site is located south of Harnham and is approximately 33.6 hectares in agricultural use. It lies within Flood Zone 1, indicating a low probability of fluvial flooding, but there are minor isolated areas of low surface water flood risk in the western sections of the site. The nearest watercourse is the River Ebble, approximately 0.9 km to the south, and the site is within the River Avon SAC catchment, requiring phosphate neutrality under the Habitats Regulations. The topography is gently sloping from 90–95 m AOD in the north to 75–80 m AOD in the south, which may influence surface water flow paths and attenuation design. These constraints mean that while fluvial flood risk is low, the drainage strategy must address surface water management, infiltration feasibility, and nutrient neutrality, ensuring compliance with Wiltshire Council SuDS guidance and CIRIA C753 standards.

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- EIA Scoping Request - Land South of Harnham FINAL

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.

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 note that the scoping report proposes to scope out Flood Risk, Drainage and Water Environment from the EIA, on the basis that the site lies within Flood Zone 1 and only minor areas of surface water risk exist. While this approach is acceptable under the EIA Regulations, the LLFA wishes to emphasise that flood risk and drainage remain critical considerations for the planning application and must be addressed in detail.

LLFA Position

- The site area exceeds 1 hectare; therefore, a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy are mandatory.
- The development will significantly increase impermeable surfaces, requiring a robust approach to surface water management in line with:

- National Planning Policy Framework (NPPF) and Planning Practice Guidance.
- Wiltshire Council SuDS guidance and CIRIA C753 SuDS Manual.
- The site lies within the River Avon SAC catchment; therefore, the drainage strategy must demonstrate phosphate neutrality and avoid adverse impacts on designated sites.

LLFA Requirements

The planning application must include:

1. Detailed FRA addressing fluvial, surface water, groundwater, and exceedance routing.
2. Comprehensive Drainage Strategy incorporating:
 - SuDS hierarchy and infiltration testing (BRE365 or equivalent).
 - Attenuation design for 1 in 100-year storm + climate change allowance (latest EA guidance).
 - Exceedance flow routing and safe management of residual risk.
 - Maintenance and adoption arrangements for SuDS features.
3. Phosphate Neutrality Measures for River Avon SAC.
4. Cumulative Impact Assessment considering other major developments in the South Salisbury area (e.g., Rowbarrow, Netherhampton Road, Downton Road).

RECOMMENDATION

Although flood risk and drainage are scoped out of the EIA, these matters are fundamental to the acceptability of the scheme and must be fully addressed through the planning application. The LLFA requests early engagement with the applicant's drainage engineers to ensure compliance with policy and best practice.

Please confirm that these requirements will be communicated to the applicant.