

To:	Lynda King	From:	Drainage Team
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Planning App Ref:	PL/2023/10495
Service Ref:	Drainage
Date:	13/01/2026

PROPOSAL

Full planning permission

Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works

SITE LOCATION

Elmfield House, Petersfinger, SP5 3BZ

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- Application Form Redacted (*Feb 2024*)
- Flood Risk Assessment & Drainage Strategy redacted (*Feb 2024*)
- Greenfield Runoff - Catchment 1 (*Feb 2024*)
- Greenfield Runoff - Catchment 2 (*Feb 2024*)
- Catchment 1 - Storage Volume Requirements (*Feb 2024*)
- Catchment 2 - Storage Volume Requirements (*Feb 2024*)
- Landscape Plan (*Feb 2024*)
- Planning, Design and Access Statement (*Feb 2024*)
- Proposed Entrance (*Feb 2024*)
- Proposed site plan (*Feb 2024*)
- Soft Landscape Plan (*Feb 2024*)
- Qbar calculation for whole site red line boundary page 1 (*Dec 2025*)
- Qbar calculation for whole site red line boundary page 2 (*Dec 2025*)
- Flood Risk Assessment & Drainage Strategy (*Dec 2025*)
- Temporary Site Access Plan (*Dec 2025*)
- Greenfield Runoff - IoH 124 Runoff calcs (*Dec 2025*)
- Catchment 1 - Storage Volume Requirements (*Dec 2025*)
- Catchment 2 - Storage Volume Requirements (*Dec 2025*)
- Greenfield Runoff - oH 124 (Qbar(urban)) Runoff calcs for CATCHMENT 1 (*Dec 2025*)
- Greenfield Runoff - IoH 124 (Qbar(urban)) Runoff calcs for CATCHMENT 2 (*Dec 2025*)
- Proposed Site Plan (*Dec 2025*)
- Proposed Site Setup Plan (*Dec 2025*)

- Soft Landscape Plan (*Dec 2025*)

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 the applicant has been reconsulted and has submitted a revised site plan and supporting documents. The updated proposal reflects changes to plot boundaries (including Plot 13), layout refinements, and inclusion of some finished floor level annotations. However, the revised submission does not address the key drainage requirements outlined in our previous response. In particular, evidence of 20% betterment in surface water discharge rates and volumes, detailed attenuation design drawings, exceedance flow routing, flotation calculations, and a construction-phase vegetation and drainage management plan remain outstanding.

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 proposal involves converting Elmfield House and outbuildings into residential units and constructing 15 new dwellings with associated access roads, parking, and landscaping. Surface water will discharge to the existing dry watercourse, as infiltration is not feasible due to shallow groundwater, with post-development flows restricted to QBAR rates (1.45 l/s for Catchment 1 and 0.82 l/s for Catchment 2) and attenuation provided through permeable paving sub-bases, attenuation crates beneath parking and turning areas, and impermeable membranes to prevent groundwater ingress.

RECOMMENDATION

Object for the following reason(s):

- It is noted that the applicant plans to restrict discharge rates from the site to the greenfield Qbar rate for all events up to the 1 in 100 year + climate change storm. Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 20% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."

The applicant will be required to resubmit calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100 year return period storm events. Once this evidence is provided, we recommend the approval of the application with the following conditions:

Once the above elements are addressed, we recommend the following condition to be attached to this application:

Conditions:

No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National 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:

1. The applicant should confirm finished floor levels are set to be at least 150mm above the nearest manhole cover level/surrounding ground level.
2. The applicant shall submit a plan showing the cross sections and design of any attenuation and its components. Within this diagram, the applicant should confirm with what impermeable material the proposed attenuation features will be lined with.
3. The applicant should provide a layout showing the overland flow routes during exceedance events with clearly marked FFLs on the plots.
4. The FRA / Ground investigations show that ground water has been encountered at a level that could interact with the attenuation. The applicant should provide flotation calculations for the proposed attenuation features.
5. 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.

INFORMATIVES

- 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](#).

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 sets out 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.