

To: Development Management From: Drainage Team (Aayushi Kochar)

Planning App Ref: PL/2025/09577 Service Ref: Drainage

Date: 14/01/2026

PROPOSAL

Full Application for the proposal to convert the existing dwelling house into 4 apartments and provide 3 family sized homes to the rear grounds. The proposal will also seek to relocate the vehicle entrance east of its current location for better visibility onto the highway and to provide wider access for modern day vehicles. The proposal will require partial demolition of the existing brick boundary wall fronting the highway to make way for the new entrance and full demolition of the single storey attached garage.

SITE LOCATION

The Old Vicarage, Heytesbury, Warminster, BA12 0HA

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Demolition Plan*
- *Design and Access Statement*
- *Existing Floor Plans*
- *Existing Site Plan*
- *Location Plan*
- *Proposed Site Plan*
- *Proposed Surface Water and foul Drainage Plan (the plan submitted is actually the Ecology Plan, not the Drainage Plan).*
- *Site Location and Block Plans*
- *Drainage Strategy*

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

Based on the *Design and Access Statement*, the site is in Flood Zone 1 with medium to low risk of ground water emergence flooding. The geology of the site includes a mixture of West Melbury Marly Chalk Formation, grey limestone arranged in couplets and deposits of pale grey Zig Zag Chalk Formation. The existing utility services on site include mains electricity, an oil powered boiler for space heating and water, high speed data connectivity, and mains sewers for foul and surface water drainage.

Based on information provided in the *Application Form*, we note that the applicant proposes to discharge surface water via soakaways and the existing watercourse, in line with the discharge hierarchy. However, all discharge options should be used to their fullest practicable extent, including opportunities for water re-use. The applicant will need to demonstrate how this has been assessed and maximised. The applicant should also note that since the site is underlain by chalk, soakaways should be sited at least 10 m away from any building, road or structure foundations, in line with CIRIA C574 Engineering in Chalk.

The *Demolition Plan* shows various trees, single story attached garage and section of northern boundary wall to be removed, and grassland areas to be retained. The applicant must provide additional information as part of a Construction Management Plan that demonstrates how pollution to existing watercourses and groundwater will be controlled during this demolition phase.

The proposed development of three new homes will increase the sites impermeable area, leading to higher surface water runoff. To mitigate this impact, the applicant must provide a detailed drainage layout illustrating the proposed system, along with comprehensive hydraulic calculations. These calculations should account for the additional runoff generated by the increased impermeable surfaces and demonstrate that the design includes sufficient attenuation to manage a 1 in 100 year storm event, incorporating climate change allowances.

The site is located in source protection zone 3 (SPZ3) for drinking water. This will have an impact on infiltration-based SuDS. The drainage strategy should address water quality issues and comply with the Environment Agency's approach to groundwater protection, which states that where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ3, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

1. The applicant must submit a detailed drainage layout plan for the site. The plan should show existing drainage infrastructure to be retained/ abandoned and proposed drainage infrastructure, including all SuDS features, pipes, connections, and outfalls.
2. The applicant must conduct hydrogeological risk assessments, where necessary, to confirm that proposed soakaway systems do not present an unacceptable risk to groundwater sources or supply.

The LLFA will seek to set Conditions to secure any outstanding drainage information once the holding objection is lifted.

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](#).
- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- 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 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.