

To:	Verity Giles-Franklin	From:	Rahul Dixit
------------	-----------------------	--------------	-------------

Planning App Ref:	PL/2025/08865
Service Ref:	Drainage
Date:	06/01/2026

PROPOSAL

Outline planning permission: Some matters reserved; for Residential development (up to three dwellings).

SITE LOCATION

LAND EAST OF 3, LOWER MARSH ROAD, WARMINSTER

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Existing and proposed site and locations plans
- Flood Risk Assessment
- Planning, Design and Access Statement

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

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 comprises an outline application for the development of up to three residential dwellings, together with associated access arrangements and parking provision.

According to the Flood Risk Assessment (FRA), the site lies within Flood Zones 2 and 3 as indicated on the Planning Flood Risk Map. However, based on flood level data provided by the Environment Agency (EA), the site is classified as being within Flood Zone 2.

The site is assessed to be at low risk of surface water flooding, but there is a high risk of groundwater flooding.

In 2025, the Environment Agency updated its Flood Map for Planning using NaFRA2 data. The revised mapping shows that the central part of the site is no longer within any flood zone, while the existing access onto the highway still intersects Flood Zones 2 and 3.

The applicant has undertaken a shadow Sequential Test which identifies 6 other available land in Warminster out of 67 sites that is at no flood risk and could be suitable for development. However, there is sufficient space within the site to locate properties within FZ1. On this basis, the layout is considered to be acceptable.

For fluvial flooding, the design flood level has been conservatively taken as 110.6 m AOD. In terms of groundwater flooding, a potential flood depth of approximately 0.15 m has been considered, based on an average ground level of 110.25 m AOD, resulting in an estimated groundwater flood level of 110.4 m AOD. The applicant has stated that groundwater level monitoring will be undertaken on site to establish the risk of groundwater emergence on site.

Design flood level is considered to be 110.6 m AOD with proposed floor level to be 300 mm above the flood level and utilising material classified as "Good" under water exclusion strategy. New services and fittings (communications wiring, heating systems, electrical services, water, electricity and gas meters) should be placed at above the level of 111.25 m AOD. All service entries should be sealed (e.g., with expanding foam or similar closed cell material).

RECOMMENDATION

No objection subject to the following conditions

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

- Evidence that the surface water disposal hierarchy has been applied.
 - The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
 - The drainage drawings plan should show the pipe / link & manhole / node numbers used in the calculations in order to link the drawing with the detailed calculations.
 - The surface water drainage strategy should demonstrate that:
 - 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 years 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.
 - Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
 - Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
 - Evidence that the finished floor levels are 300 mm above the maximum predicted flood level.
 - The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).
 - 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.
- 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:

- The site is located in an area susceptible to groundwater flooding. Therefore, in line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant is required to carry out a site-specific groundwater flood risk assessment that includes all available information and data from local sources such as historical records, parish councils, flood action groups and borehole records. In areas susceptible to groundwater flooding

infiltration SuDS is not permitted unless it can be demonstrated to be appropriate. The groundwater assessment must include/consider the following:

- Groundwater level monitoring (taking into account seasonal variations).
- The interaction between different sources of flooding.
- How groundwater will impact on the proposed drainage system.
- The interaction between groundwater, groundwater recharge and aquifers.

The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption.

INFORMATIVES

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.

Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.

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.