

To:	Adam Madge	From:	Drainage Team
------------	------------	--------------	---------------

Planning App Ref:	PL/2025/05762
Service Ref:	Drainage
Date:	16/02/2026

PROPOSAL

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.

SITE LOCATION

Armishaw Removals, Netherhampton Road, Netherhampton, Salisbury, SP2 8RA

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 (*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*)
- Existing Site Plan (*Existing Drainage on site*) (*Nov 2025*)
- Flood Risk Assessment Land South Netherhampton Road (*Nov 2025*)
- Proposed Site Plan (*Jan 2026*)
- Flood Risk Assessment (*Jan 2026*)
- Existing Site Plan – Drainage Site Mapping (*Jan 2026*)
- Existing Drainage Report (*Jan 2026*)
- Flood Metric (*Jan 2026*)
- Surface Water Drainage Strategy (*Jan 2026*)
- Flood Evacuation Plan (*Jan 2026*)
- Proposed Site Plan (*Jan 2026*)

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.

We acknowledge that the applicant has reconsulted with additional documents, including the surface water drainage strategy and an updated Flood Risk Assessment.

The proposed surface water drainage strategy for the development provides a solution for managing runoff from the 0.593 ha impermeable area. The design responds appropriately to site constraints particularly the presence of shallow groundwater at approximately 1.2 m below ground level identified during BRE365 infiltration testing, which makes infiltration SuDS unsuitable under the 2025 National SuDS Standards requiring at least 1 m clearance between SuDS bases and groundwater. Therefore, the strategy adopts a sealed system comprising lined geocellular attenuation tanks, lined permeable paving, green roofs, proprietary pollution control devices, and filter drains, with all flows restricted to 4.0 L/s before discharge to the public surface water sewer beneath Netherhampton Road. This discharge rate is justified through IH124/ICPSuDS calculations, which show a greenfield QBAR of 1.4 L/s and a 1in100year rate of 4.5 L/s, since achieving QBAR would require an orifice smaller than 75 mm, below Wessex Water's minimum threshold and therefore at high blockage risk, the design appropriately applies the permitted relaxation for brownfield sites under the National SuDS Standards to arrive at 4.0 L/s, which remains below the natural 1in100 flow and therefore avoids increasing downstream flood risk. Hydraulic modelling using InfoDrainage confirms that the system can safely attenuate runoff during the 1in100year plus 45% climate change event without flooding, and the combination of permeable paving, green roofs, and proprietary treatment ensures compliance with SuDS water quality requirements. -control devices, and filter drains, with all flows restricted to 4.0 L/s before discharge to the public surface water sewer beneath Netherhampton Road. -SuDS calculations, which show a greenfield QBAR of 1.4 L/s and a 1-in-100-year rate of 4.5 L/s-in-100 flow and therefore avoids increasing downstream flood risk. Hydraulic modelling using -in-100-year plus 45% climate change event without flooding, and the combination of permeable paving, green roofs, and proprietary treatment ensures compliance with SuDS water quality requirements.

Overall, subject to Wessex Water confirming the final discharge connection and a CCTV survey of existing infrastructure.

It is currently unclear how the site drains, so the applicant must provide full details of the existing drainage arrangement, including runoff pathways, discharge points, and any drainage infrastructure, to demonstrate compliance with the National Standards for SuDS, specifically Standard 1 ([Standard 1: runoff destinations](#)), which requires understanding existing runoff destinations before selecting a discharge method. The applicant must also supply the brownfield runoff rates in line with Wiltshire Council's Betterment Strategy (Section 2.2),

([Microsoft Word - Betterment Strategy June 2024 - FINAL v2](#)), which requires discharge to be reduced as close as practicable to greenfield rates

RECOMMENDATION

Object for the following reasons

The proposed discharge rate is not compliant. Wiltshire Council's Betterment Strategy requires applicants to evidence brownfield runoff rates and justify their discharge method within the surface water hierarchy. Under SuDS Standard 1, runoff destinations must be prioritised and benchmarked against greenfield performance.

The applicant must therefore provide:

- The applicant must provide the brownfield runoff rates, demonstrate a discharge rate as close as practicable to greenfield (~1.4 L/s), or alternatively show a minimum 30% betterment for each brownfield storm event.
- The applicant must provide a written confirmation from Wessex Water for the connection to the surface water sewer on Netherhampton Road
- The applicant needs to provide a CCTV survey details for the existing drainage system, including invert levels, pipe condition, and confirmation of the existing connection points.
- The applicant is required to provide a Groundwater Risk Addendum that assesses groundwater emergence risk, seasonal high groundwater levels, and includes uplift/floatation checks for all attenuation tanks.
- The applicant must provide full cross section and long section drawings for all proposed SuDS features, to enable proper assessment of levels, gradients, connectivity, capacity, and their interaction with existing ground conditions and flood risk pathways. -section and long section drawings for all proposed risk pathways. -section and long-section drawings for all proposed -risk pathways.
- An exceedance flow routing plan must be submitted, illustrating overland flow paths designed to minimise risk to people and property.
- The applicant is requested to overlay the site's surface water flood risk mapping (as shown in Figure 3 of the Flood Metric document) onto the drainage strategy, to ensure that proposed drainage routes and exceedance paths do not conflict with identified flood risk areas water flood risk mapping (as shown in Figure 3 of the Flood Metric document) onto the drainage strategy, to ensure that proposed drainage routes and exceedance paths do not conflict with identified flood risk areas-water flood-risk mapping (as shown in Figure 3 of the Flood Metric document) onto the drainage strategy, to ensure that proposed drainage routes and exceedance paths do not conflict with identified flood-risk areas
- The applicant should confirm who will be responsible for the long-term ownership and maintenance of the SuDS system, including the tanks, permeable paving and other drainage features.
- No development shall commence on site until 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, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

INFORMATIVES

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.