

To:	Gen Collins	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2026/00195
Service Ref:	Drainage
Date:	16/02/2026

PROPOSAL

Outline Planning Permission with some matters reserved except for access for the erection of up to 205 no. dwellings, community hub, public open space, access, infrastructure and associated works, with all other matters reserved.

SITE LOCATION

Land West of Westbury Road, Warminster.

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*
- *Flood Risk Assessment & Drainage Strategy*
- *Illustrative Landscape Masterplan*
- *Location Plan – Aerial*
- *Parameter Plan – Green Infrastructure Plan*
- *Phase 1 and 2 Site Investigation and Appendix A*
- *Phase 1 and 2 Site Investigation Appendices B-I*
- *Resubmission Covering Letter*
- *Appendix A – Indicative Masterplan*
- *Appendix D – Ground Investigation Extracts*
- *Appendix E – Greenfield Run-off Calculations*
- *Appendix F – Wessex Water Correspondence & Information*
- *Appendix G – Drainage Strategy*
- *Appendix H – Impermeable Area*
- *Appendix J – LLFA Pre-Application Consultation Response*
- *Appendix K – EA Product 4 Flood Risk Information*
- *Appendix L – Hydraulic Modelling*
- *Appendix M – EA & LLFA Consultation Response*

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 LLFA notes this application is a resubmission of PL/2021/09013, with some changes from the previously submitted scheme. The applicant has stated PL/2021/09013 was dismissed at an uncontested appeal due to the absence of a sequential test. We advise the LPA that the sequential test is a planning matter to determine on, and not a technical drainage matter.

We note the northwestern portion of the site is located in Flood Zone 3.

The applicant proposes to attenuate surface water flows, before discharging into the watercourse at a restricted rate. Downstream from the site, the watercourse flows beneath a railway culvert, into Portway Pond, and then discharges into the River Were. The applicant has provided a site-specific hydraulic model of the upstream catchment from Portway Pond in Appendix L to model the fluvial flood zones in greater detail than shown within the default EA RoFRS mapping. It is noted that the modelled flood zones have been utilised within the drainage design, and that all built form development is situated within Flood Zone 1. It is noted that local residents have submitted photos of parts of the site flooded – these do appear to correlate with the flood extents within the hydraulic model (based on the photos provided), although we are unable based on the limited photos provided to give comment on the relation to modelled flood zone extents and whether the observed flooding is greater than the modelled.

In section 3.4 of Appendix L the applicant has stated that “both the Revitalised Rainfall Runoff model (ReFH2) and the FEH Statistical Method were used to derive peak flows for the catchment”. The applicant has then progressed modelling using the most conservative value to represent the worst-case scenario for flood zone modelling. This is an appropriate stance to take and aligns with the EA’s Flood Estimation Guidance in that both methods have been compared, with the more conservative values selected.

We remind the LPA that although there is local flooding, the applicant is not obliged to resolve this, just not exacerbate as a result of their development proposals.

In section 4.8 of the Flood Risk Assessment & Drainage Strategy the applicant has referenced that SFRA mapping represents the lower west part of the site is at high risk of groundwater flooding. However, onsite groundwater testing has revealed that groundwater was encountered between 1.2-1.8mbgl in this area of the site and was not encountered in other areas. The applicant has concluded groundwater flood risk is low.

It is noted in section 6.9 of the Phase 1 and 2 Site Investigation and Appendix A document that “infiltration rates are likely to be less than 1x10⁻⁶m/s and therefore efficient soakaway drainage is unlikely to be feasible”. The LLFA note the infiltration testing undertaken was not compliant with BRE365 as fewer than 3 tests were completed at each trial pit. The applicant is encouraged to undertake further BRE365 compliant testing at TP07 and TP03. If feasible, infiltration must be utilised within the drainage strategy, this may include a hybrid strategy whereby both infiltration and discharge to a watercourse is proposed. It is accepted however, that the testing has been used to demonstrate that a system solely reliant on infiltration is not achievable on site, and therefore any additional testing in order to help refine a hybrid strategy could be undertaken as part of the detailed design.

The applicant proposes to discharge attenuated runoff to the ordinary watercourse as per the existing catchment and notes that they will provide a 30% betterment over Qbar within their drainage strategy. Within the drainage strategy drawing (Appendix G) the discharge rate is incorrectly stated as 20.5l/s, whereas the applicant has calculated Greenfield Runoff Rates to be 16l/s for the Q1 event (based on calculation with the FEH statistical method). There are two anomalies here to be corrected:

- i. The Qbar event relates to the FSR / IH124 Method and not the statistical FEH Method
- ii. The 20.5l/s rate shown on the submitted plans is higher than the comparative greenfield rates calculated and presented within Appendix E.

The applicant should update all documentation to reflect consistently the discharge rates on the site. **We would request this is done prior to determination of the application so as there is no ambiguity in the discharge rates flow will be restricted to.**

It is noted the applicant has stated in the Flood Risk Assessment & Drainage Strategy that swales, rain gardens & permeable paving will be proposed within the drainage strategy. The LLFA would encourage the applicant to propose SuDS where possible to demonstrate a ‘SuDS approach’ has been adopted, in adherence to the National Standards for SuDS. We will expect full adherence to the National Standards for SuDS to be demonstrated as part of the detailed design of the site.

It is noted that foul drainage is now proposed to be pumped through a new rising main connection to the public sewer as agreed with Wessex Water. This is a change to the proposal submitted under PL/2021/09013, and a package wastewater treatment centre with associated reed beds is no longer proposed on site. The proposed foul pumping station is proposed to be sited within the area of Flood Zone 1 based on the submitted Hydraulic Modelling Report.

RECOMMENDATION: Holding Objection:

The applicant must clarify the proposed discharge rate from the site. It is noted the applicant has stated they will provide 30% betterment over Qbar rates within their drainage strategy, with the greenfield runoff rates for the Q1 event being calculated as 16l/s (FEH statistical method). In contrast, the drainage strategy drawing (Appendix G) states the discharge rate as 20.5l/s.

The applicant must confirm the proposed discharge rate and ensure consistency across all submitted documents to remove any ambiguity regarding discharge restrictions. The applicant must also clarify that the Qbar event calculations relate to the FSR / IH124 Method, rather than the statistical FEH method as stated by the applicant.

The following information can be resolved via condition, once the holding objection has been resolved:

1. **The applicant must provide further information related to the surface water drainage strategy:**
 - a) National Standards for SuDS: [Standard 1: runoff destinations](#):

To demonstrate compliance with the drainage disposal hierarchy in paragraph 1.2 of National Standards for SuDS, the LLFA would expect the applicant to utilise infiltration where possible.

Currently TP03 and TP07 suggest that it may be possible to partially dispose of surface water via infiltration. The LLFA would encourage the applicant to undertake further investigations in line with paragraph 3.14 of the National Standards for SuDS and utilise infiltration if feasible.

Additionally, at detailed design the LLFA require the applicant to demonstrate rainwater harvesting will be incorporated in the drainage strategy to comply with the drainage disposal hierarchy set out in paragraph 1.2 of National Standards for SuDS.

- b) National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#):

It is noted the applicant has undertaken additional hydraulic modelling of the flood zones (Appendix L) as referenced in the Assessment section of this response. To demonstrate that there will no increased flood risk downstream as a result of the development, the applicant must complete further modelling incorporating the detailed design of the proposed drainage network within this hydraulic model.

- c) National Standards for SuDS: [Standard 2: interception](#), [Standard 4: water quality](#) & [Standard 5: amenity](#)

It is noted the applicant has stated in the Flood Risk Assessment & Drainage Strategy that swales, rain gardens & permeable paving will be proposed within the drainage strategy.

At detailed design, the applicant must provide details of where each feature will be proposed. The applicant must ensure this information is provided to demonstrate adherence with a SuDS approach:

- Standard 2: at least the first 5mm of rainfall for the majority of rainfall events does not result in runoff from the site to surface waters or piped drainage systems.
- Standard 4: protects surface waters, groundwater and coastal waters by managing the quality of the surface water runoff to adequately address water quality risks from the development.
- Standard 5: maximises benefits for amenity through the creation of multi-functional places and landscapes.

- d) National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#):

The applicant must provide overland exceedance routes on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate there is no increased flood risk to people or property as a result of the development.

- e) The applicant should provide year-round groundwater monitoring results to demonstrate any seasonal variation in groundwater flood risk is safely managed by the drainage strategy.

We note the site is situated near a groundwater flood warning zone. While the applicant has provided some groundwater monitoring results within section 4.8 of the Flood Risk Assessment & Drainage Strategy, to accurately account for all seasonal variations, and ensure the drainage strategy is designed to safely managed surface water, without interaction

from groundwater, further monitoring is required ([Standard 3: management of extreme rainfall and flooding](#), para 3.11)

In line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant must undertake year-round groundwater monitoring, resulting in a groundwater assessment that considers 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.
- f) The applicant must provide detailed calculations and modelling to demonstrate that the surface water drainage strategy:
- 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 year 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.
- g) It is noted the applicant has provided example section drawings of permeable paving, swales and raingardens, however calculations that demonstrate the sizing of any attenuation/ SuDS features and cross & long section drawings of the basin are required (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).
- h) The applicant must provide calculations to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS. Calculations that demonstrate compliance with these interception requirements should be provided. (National Standards for SuDS: [Standard 2: interception](#)).
- i) The applicant must confirm the finished floor levels for all properties on a plan overlaying modelled pluvial flood risk, and a separate plan with fluvial flood risk (National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#))
- j) At a more detailed stage of design, the applicant will be required to provide a bespoke maintenance, not snips from the SuDS manual (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).
- k) At a more detailed stage of design, the applicant will be required to provide a construction management plan to demonstrate how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction (National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity](#)).

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](#).

- The applicant stated in section 10 of the Flood Risk Assessment & Drainage Strategy that maintaining elements of the drainage strategy may be the responsibility of individual plot owners. The applicant must ensure the drainage strategy, and a copy of the detailed maintenance regime, is included in the title deeds of each property.
- The applicant must agree on a discharge rate with the sewerage undertaker for the region to discharge foul flows into the sewer network.

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.