

## FORMER WESTBURY AND DISTRICT HOSPITAL

## SECTION 73 PL/2023/07503

## BACKHOUSE RESPONSE NOTE

26 MARCH 2026

This note provides a response to comments from Wiltshire Council Drainage dated 16<sup>th</sup> February 2026 and a subsequent meeting with drainage engineers and the planning officer. We have responded to the comments in the table below and corresponding Appendix 1 (Drainage Implementation Site Inspection Report prepared by Backhouse). This note should be read in conjunction with the accompanying Drainage Maintenance Plan dated 13<sup>th</sup> March as prepared by AWP engineers, which now includes inspection of the upper basin banks (checking for scour and remediating as necessary to avoid instability).

| Item | Resident Comment                                                                                                                                                                                                                                       | LLFA Response                                                                                                                                                                       | Applicant/Designers Response                                                                                                                                                                                                                                                                                                                                                                                                         |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | The cut-off swale behind plots 25 to 32 (house numbers 47 to 61) has not been provided                                                                                                                                                                 | Applicant to state if this is an omission or if this now not needed? Evidenced by updated drainage strategy and calcs                                                               | <b>AWP:</b> There must be adequate interception as separate comments confirm incoming flows to the basin and water being held in the basin. There are no known customer complaints from residents backing on to the agricultural land.<br><br>See Appendix 1 for further detail.                                                                                                                                                     |
| 2    | the rain garden bears no resemblance to the approved drainage or landscaping plans, and instead of a sloping area with timber deck path and marginal planting is both unsightly and dangerous, with a near 6 foot drop within a metre of the play area | Applicant is to provide reasons why the As Built differs from the latest plans                                                                                                      | <b>Backhouse:</b> Updated planting schedule submitted showing a more robust mix of planting, and once the Section 73 is approved will be implemented. This will bring it in line with the approved plans.                                                                                                                                                                                                                            |
| 3    | the rain garden is the driest point on site and even in sustained heavy rainfall is no more than a puddle - the poorly constructed adjacent block paving has more of a puddle!                                                                         | Applicant is to provide evidence that the rain garden is accepting the anticipated level of runoff                                                                                  | <b>AWP:</b> The raingarden serves a relatively small catchment (just 10 properties) and by design would only fill to 0.5m depth in the 1 in 100 year storm with allowance for future climate change and urban creep. To remain conservative, the design also does not account for infiltration. This should not be seen negatively and once the revised planting has been completed the form and function should be more favourable. |
| 4    | the long-standing issues caused by the off-site flows from the adjacent farmer's field and recreation ground are not limited to named storms, but occur whenever there is a sustained period of heavy rainfall                                         | the applicant should complete and submit additional overland flow assessments for the adjacent fields to be able to quantify and demonstrate that despite this, the onsite drainage | <b>AWP:</b> It is unclear what issues are occurring. There are no known issues impacting properties at the edge of site. Runoff from upstream is intercepted and directed to a series of basins and the final bund at the lower edge of site. The basins collectively provide >500m <sup>3</sup> which is equivalent to the 1 in 100 year greenfield runoff volume from the                                                          |

|    |                                                                                                                                                                                                                                                                                                   |                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                                                                                                                                                                   | system still functions as expected                                                                                               | upstream catchment. The final bund at the lower edge of site offers additional storage which can promote further infiltration and evapotranspiration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5  | the applicant chose to reduce the attenuation basins from 3 to 2, and removed the geo-cellular soakaway in the southern corner of the site - do the 2 remaining basins still provide 500m3 of attenuation?                                                                                        | Applicant to provide cross sections, calcs and revised As Built plan to support                                                  | <b>AWP:</b> As above, the two basins offer >500m3 volume.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 6  | The first infiltration basin in the southern corner regularly nearly overflows                                                                                                                                                                                                                    | Applicant to investigate why this might be the case. Undersized for blockage / restriction downstream due to lack of maintenance | <b>AWP:</b> If it is filling then it confirms that flows are clearly being intercepted. The system offers greater volume than the equivalent system on the pre-development site and provide more opportunity for infiltration, so in all cases betterment has been provided.                                                                                                                                                                                                                                                                                                                                                                       |
| 7  | this is clearly not a betterment of what was here when the site was a hospital the drainage features that have been implemented are of poor construction, and already failing/collapsing, and in places is downright dangerous, failing all known standards of health and safety and construction | Not for LLFA to comment on – request the applicant provides comment and remedial action as needed                                | <b>AWP:</b> The previous site had no attenuation storage for runoff from the hospital building or external catchment. Flows were discharging unattenuated into the foul drainage network, increasing the risk of foul sewage flooding. The proposed development provides significant volumes of on-site storage which reduce flood risk, protecting properties downstream whilst also reducing flows into the foul sewer network. There are additional measures in place to intercept and reduce the impact of runoff from the upstream agricultural land which also eases pressure on the downstream highway drainage, again reducing flood risk. |
| 8  | the first infiltration basin in the southern corner has a large hole in the side of the bank where water gushes out of during periods of heavy rainfall                                                                                                                                           | See Point 4                                                                                                                      | <b>AWP:</b> We anticipate this is the inlet on the eastern edge of basin, where flows are received from the cut-off feature inside the south-eastern boundary. Refer to Item 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 9  | the bank supporting the temporary wooden fence and footpath separating the 'rain garden' from the play area is itself supported by wooden planks and is collapsing                                                                                                                                | Not for LLFA to comment on – request the applicant provides comment and remedial action as needed                                | This is a management company matter                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10 | the bank at the site entrance has crept over the footpath along the Butts, and in places below the cedar tree there are cracks and holes appearing in the side                                                                                                                                    | Not for LLFA to comment on – request the applicant provides comment and remedial action as needed                                | This is a management company matter                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

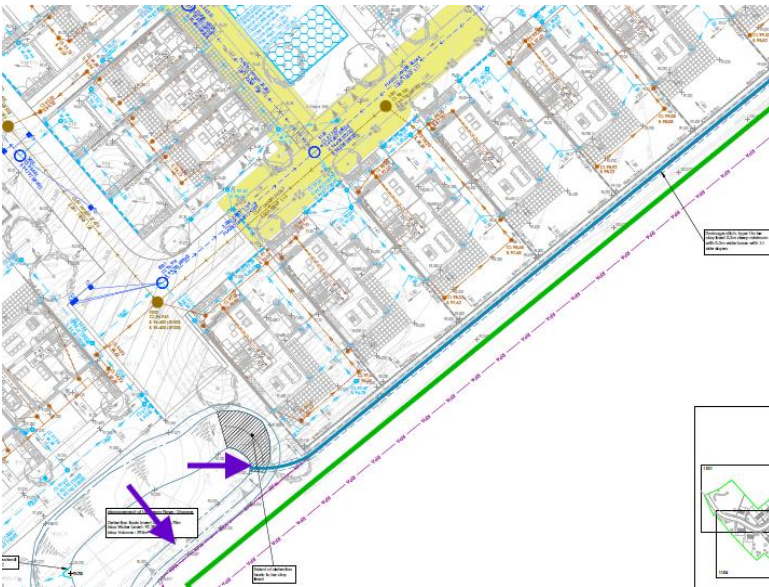
|    |                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | the vent pipes for the geocellular crates are not UV resistant but brown 'underground' pipes so are deteriorating badly, and one has broken completely with the cap lying on the ground                                                                                                                                | Not for LLFA to comment on – request the applicant provides comment and remedial action as needed                                                             | <b>AWP:</b> The vent pipes form part of the management company's responsibility and should be inspected, maintained and remediated as necessary, with opportunities to adjust the design or specification to avoid repeat issues.                                                                                                                                                                              |
| 12 | the Drainage Maintenance Plan in Appendix E is, quite frankly, a work of fiction, as the applicant has not even followed even the most basic of the inspections and checks, let alone completing any maintenance or remedial works (as can be seen from the state of the attenuation basins, rain garden, and bunding) | The applicant is to provide evidence that the DMP being followed. Records should be provided all drainage inspections and remedial actions completed to date. | See Appendix 1                                                                                                                                                                                                                                                                                                                                                                                                 |
| 13 | the changes to the headwall and basin within and adjacent the RPA of the cedar tree proposed application have already been implemented, prior to this application being determined                                                                                                                                     | No Comment.                                                                                                                                                   | <b>AWP:</b> The works were necessary interventions to align with the approved strategy, whereby flows emerging from the headwall were intended to rain over the open space and not enter the site access road.                                                                                                                                                                                                 |
| 14 | the works have not even been done in accordance with what was submitted in August 2024, and the basin is partially constructed with sandbags!                                                                                                                                                                          | Applicant to advise when correct headwall will be installed                                                                                                   | <b>AWP:</b> The existing headwall specification is due to be upgraded and once the Section 73 application is approved the headwall will be implemented in line with the details submitted.                                                                                                                                                                                                                     |
| 15 | is it really safe for this basin to be sited next to the public art bench?                                                                                                                                                                                                                                             | Not for LLFA to comment on – request the applicant provides comment                                                                                           | <b>AWP:</b> It is very normal for sustainable drainage systems (SuDS) to be located in and around areas of amenity. CIRIA C753 'The SuDS Manual' advises that SuDS should consider four pillars of design. One of these pillars is 'amenity'. The storm events where the basins pose the greatest risk (deepest water) are the same events where the risk of the amenity spaces being occupied remains lowest. |
| 16 | the original headwall and basin within the RPA has been filled in with what appears to be very poor soil and rubble                                                                                                                                                                                                    | Not for LLFA to comment on – request the applicant provides comment                                                                                           | The Section 73 seeks approval of details for the headwall and making good.                                                                                                                                                                                                                                                                                                                                     |
| 17 | The south-eastern properties and road are lower than the open space above the cellular tank. Does the tank receives flows from this catchment?                                                                                                                                                                         |                                                                                                                                                               | <b>Yes</b> – the tank is buried at depth and receives a positive drainage connection from properties and the adopted road network. The drainage system which links to this tank has been approved by Wessex Water and is currently going through a maintenance period prior to being vested as an adopted asset.                                                                                               |

## APPENDIX 1 – DRAINAGE IMPLEMENTATION SITE INSPECTION REPORT

Backhouse can confirm the following from our recent site inspection:

*See below a snip of the site; we stood in the attenuation basin and took a couple of photos indicated by the purple arrows.*

- *Looking E towards the drainage ditch*
- *Looking SE towards the neighbouring land of which the basin is designed to catch the run off*



### **E towards Drainage Ditch**

*Photo 1 – There is clear evidence of water run off into the basin – it has caused a small track line through the grass*

*Photo 2 – There is clear evidence that the 'ditch' was created and that the minimal run off from the neighbouring field is being caught and directed to the basin*

*Photo 3 – Evidence that the gabion walls stand c1m high and that there is no run off getting into the gardens – we also have not had a single customer care report in the last 24 months since my involvement of these gardens being wet in any way.*

*We believe this clears up the ditch element of the conversation we had.*



***SE towards neighbouring land***

*Photo 1 – Clear evidence along the side of the basin wall of where surface water run off is coming in to the ditch*

*Photo 2 – close up of the track lines the water has created*



*In conclusion the scheme is in and working exactly as. We cannot see any reason to hold up any further works here.*