

To:	Julie Mitchell	From:	Drainage (Barney Taylor)
------------	----------------	--------------	--------------------------

Planning App Ref:	PL/2026/01607
Service Ref:	Drainage
Date:	22/04/2026

PROPOSAL

Change of use of Eastleigh Court from offices to short-stay accommodation; repair, restoration and enhancement of Eastleigh Court including demolition of existing single storey extension and construction of replacement single storey extension; exterior alterations and repairs; roof repairs; installation of new dormers and replacement rooflights; change of use of the former Eastleigh Court Stables from a dwelling to short-stay accommodation; erection of ancillary building for use as an event space and pool house; new swimming pool, demolition of an outbuilding; landscaping; vehicle parking, new electricity substation; installation of new automatic gates to north and south entrances and associated works.

SITE LOCATION

Eastleigh Court, Bishopstrow, Warminster, BA12 9HW

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*
- *Cover Letter*
- *Draft Construction Management Plan*
- *Existing Site Plan*
- *Flood Risk and Outline Drainage Strategy*
- *Proposed Site Plan*
- *River Avon SAC Nutrient Calculator*

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 note the applicant has undertaken groundwater monitoring in March demonstrating groundwater at 2.79-3.01mBGL. If deeper borehole soakaways are proposed, the applicant may be required to undertake further groundwater testing. At this stage, BRE365 testing is required to demonstrate that there is a safe and feasible surface water drainage strategy. Until this information is provided, the holding objection cannot be removed. The LLFA do acknowledge the applicant is providing roof rainwater disconnection from foul sewers in the proposals.

As part of the LLFA Pre-Application response dated 5th June 2025, the LLFA did comment on the applicant's queries related to longer drain down times & infiltration testing, stating "*we would expect the applicant to complete full BRE365 testing in accordance with Wiltshire Council's soakaway policy (Developers-guidance-note-surface-water-soakaways-2.pdf). This would prove far more effective in demonstrating the drainage hierarchy has been exhausted, but may also provide more favourable rates*". In addition to this, we stated that half-drain down times are measured on the 1 in 30-year event and encouraged the use of blue/green SuDS.

RECOMMENDATION: Holding objection as further information required

1. National Standards for SuDS: [Standard 1: runoff destinations](#)

At this stage, it is not clear there is a feasible drainage strategy due to the uncertainty regarding the infiltration at the site. While acknowledging the applicant has stated further BRE365-compliant infiltration testing will be undertaken, this information is required at this stage to demonstrate there is a safe & feasible surface water drainage strategy in principle.

Noting the applicant may propose deep infiltration devices – there must be 1m clearance between the base of the infiltration feature and groundwater to prevent interaction. Additionally as noted by the applicant, the EA must be consulted on deep soakaway devices.

The applicant is referred to paragraph 3.14 of the [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#) for guidance on the infiltration methods & industry guidance.

Once the holding objection is resolved, the following information can be provided via condition:

1. The applicant must provide further information regarding the surface water drainage strategy:
 - a. Detailed hydraulic modelling of the surface water drainage network to demonstrate there is no surcharging in the 1 in 1 year event and no flooding on site for a 1 in 30 year plus climate change rainfall event.
 - b. Pre-development overland flow routes. We note the applicant has provided post-development overland flow routes, however to demonstrate there is no increased flood risk to adjacent people & property, the applicant must also provide pre-development overland flow routes.
 - c. Calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with [Standard 4: water quality](#) of the National Standards for SuDS.
 - d. Further blue/green source-control SuDS across the extent of the development to manage water quantity and maintain water quality in accordance with [Standard 2: interception](#) of the National Standards for SuDS.
 - e. The applicant must submit a maintenance strategy for all drainage features onsite, outlining maintenance activities undertaken, who is responsible for completing maintenance, and the frequency of maintenance.
 - f. The applicant must submit a construction management plan that demonstrates how flood risk to people & property, and pollution risk to groundwater will be mitigated throughout construction.

INFORMATIVES

- The applicant must agree a discharge rate with the foul sewerage provider for the region.

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.