

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

Planning App Ref:	PL/2026/01683
Service Ref:	Drainage
Date:	14/05/2026

PROPOSAL

Full planning permission for Conversion of rear part of existing ground floor commercial unit to form residential flat, retention of commercial unit to front portion of ground floor. Construction of single dwelling on hard standing area to rear of 2 Market place, including landscaping and amenities.

SITE LOCATION

32 Market Place, Warminster, BA12 9AN

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
- Location, Block and Site Plans
- Existing and Proposed Plans and Elevations
- Planning and Flood Risk Assessment

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.

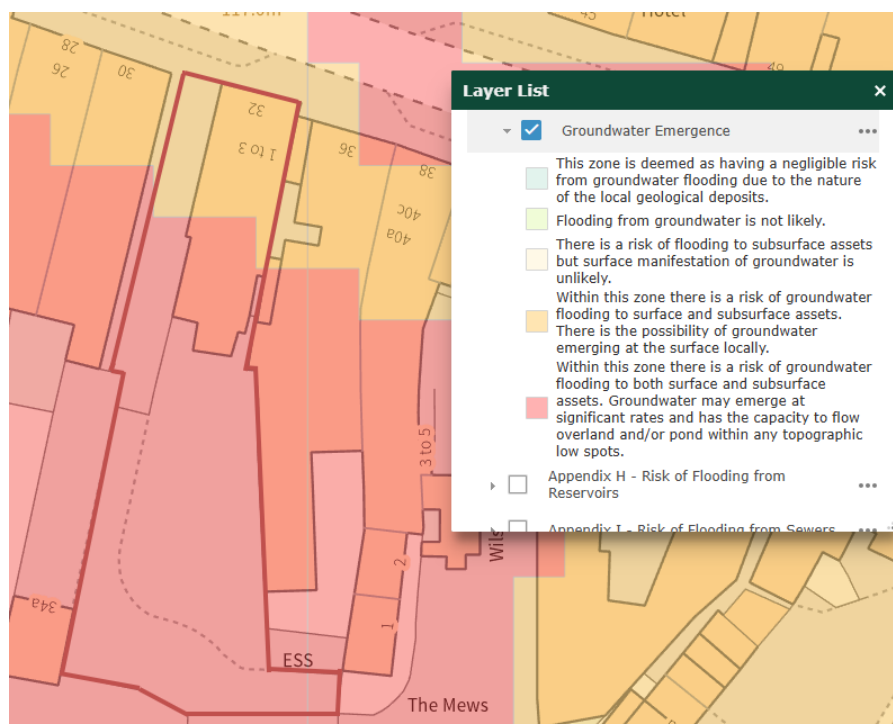
Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

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 FRA identifies the site as being located within Flood Zone 1, indicating a low risk of fluvial flooding. However, surface water flood mapping highlights that the site is at a high risk of pluvial flooding, with the existing access along with the proposed flat and dwelling situated within an area of medium surface water flood risk. Flooding is predicted to occur during rainfall events with return periods ranging from the 1 in 30-year to the 1 in 100-year event.

In contrast, the Strategic Flood Risk Assessment (SFRA) indicates that groundwater risk varies across the site. The northern part of the site, including the access, is associated with a medium level of groundwater flood risk, with groundwater levels recorded between 0.025 m and 0.5 m below ground level. The southern portion of the site is identified as being at a higher risk, with groundwater levels recorded as shallow as 0.025 m below the ground surface.



The FRA states propose new garden and landscaped areas coupled with soakaways to dispose of grey water from roofs, reducing surface water runoff from the site.

The proposal is introducing a more vulnerable development when its converting the commercial unit into a residential one as well as develop new dwelling. No drainage details have been provided – the applicant is required to provide further information to demonstrate the proposals will have safe access and egress during the design flood along with appropriate flood resilience measures in place.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a detailed review of the drainage and flood risk aspects of the proposal:

- The applicant shall provide details of the proposed flood resilience measures, including confirmation of finished floor levels in relation to the predicted 1 in 100-year flood level (including appropriate freeboard) for both existing and proposed development. It shall clearly demonstrate the relationship between flood levels and internal floor levels.
- 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 demonstrating that safe access and egress during the design flood can be achieved. Guidance on the preparation of an emergency plan can be found [here](#)

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and National Technical Standards for SuDS.

In order to discharge the above drainage condition the following additional information must be provided

- A clearly labelled drainage layout plan showing existing and proposed drainage pipe networks and any SuDS as per the drainage strategy.
- The applicant must ensure there is 5m minimum clearance between the soakaway any road or built structure.
- Evidence that soakage tests have been undertaken in accordance with BRE 365 to demonstrate that infiltration is feasible. The applicant is referred to the informatives for further information on BRE365.
- Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

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 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.