

Wiltshire Council Planning Consultation Response

18/06/2026

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Application No: PL 2025 06176
Retrospective permission for change of use from a lawned habitat area and the creation of a water feature that is enhancing the wildlife habitat of a garden that contains has a mixture of lawn, wildflower area, woodland and riparian habitats
Manor Farm, Allington, Devizes, SN10 3NN

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

☐	No Comment
☐	Support
☐	Support subject to conditions (please set out below)
☒	Object (for reasons set out below)
☐	No objections

Matters Considered:

Documents Reviewed:

- Application form redacted (Sept 2025)
- Location plan (Sept 2025)
- Block plan (Sept 2025)
- Pond cross section (Sept 2025)
- Water feature eastern perspective (Sept 2025)
- Water feature (Jan 26)
- Flood Risk Management Report (Jan 26)
- Flood Risk Management Report (March 26)

The commentary included in the LLFA's previous response (Feb 2026) still apply.

In February 2026, the LLFA advised that the only way to demonstrate that the proposal would not result in adverse impacts, taking into account all return period events and the effects of climate change, would be through hydraulic modelling of both the pre-development and post-development scenarios. In the absence of such modelling, the LLFA recommended that the applicant consider modifying the pond to operate as an offline feature. This would require reinstating the original watercourse and reconfiguring the pond. The LLFA also supported the EA's request for a site specific FRA.

The applicant subsequently submitted an updated Flood Risk Management Report dated March 2026; however, this report does not address the concerns previously raised. The applicant has not provided a comprehensive assessment of existing fluvial flood zones or areas at risk of pluvial flooding, as would form part of a site-specific FRA. The updated report does include a section titled "Consideration of Climate Change (38% Central Allowance)", as requested by the

EA, but does not contain any actual assessment of climate change impacts. Instead, the report simply states that flood levels are not expected to increase materially under climate change scenarios, without supporting evidence or analysis.

The applicant has also not submitted any hydraulic modelling to assess flood risk associated with the proposed development, nor have they provided any plans or proposals indicating works to modify the pond so that it could function as an offline feature.

Although the updated version of the FRMP (March 2026) attempts to explain previous concerns in more detail, the report does not actually present any further evidence to support these claims, as previously requested. Therefore, the LLFA's previous comments still apply.

Objections:

The drainage team in their capacity as Lead Local Flood Authority have the below objections to the application; these must be overcome before a drainage objection can be removed:

- The applicant should provide a site-specific FRA that addresses the EA's requirements. These requirements were not addressed in the revised version of the FRMP.
- Hydraulic modelling considering the pre-development and post-development scenario, demonstrating no increase in flood risk due to the development. Hydraulic modelling should consider all storm events up to the 1 in 100 year + climate change scenario, as the constructed online pond is altering the natural flow regime of the existing ordinary watercourse

or

Consideration of design alterations to reinstate the watercourse and re-configure the pond as an offline feature. These comments were not considered in this new version of the FRMP.

- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes any work impacting the 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](#).

Megan Macpherson (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.