

To:	Andrew Thomas	From:	Drainage Team
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Planning App Ref:	PL/2026/02266
Service Ref:	Drainage
Date:	26/05/2026

PROPOSAL

Full planning permission for erection of 9 residential dwellings, access, parking, gardens, landscaping and associated works.

SITE LOCATION

Land south of, Park Street, 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
- Landscape Detail Plan
- Location - Site Plan
- Planning Statement
- Plot 1 Proposed Plans
- Plot 2 Proposed Plans
- Plot 3 Proposed Plans
- Plot 4-5 Proposed Plans
- Plot 6-7 Proposed Plans
- Plot 8-9 Proposed Plans
- Design and access statement
- Flood risk assessment
- Proposed Site Plan
- Proposed Site Plan-2
- Surface Water Drainage Strategy
- Street Scenes & Sections Sheet 1
- Street Scenes & Sections Sheet 2

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.

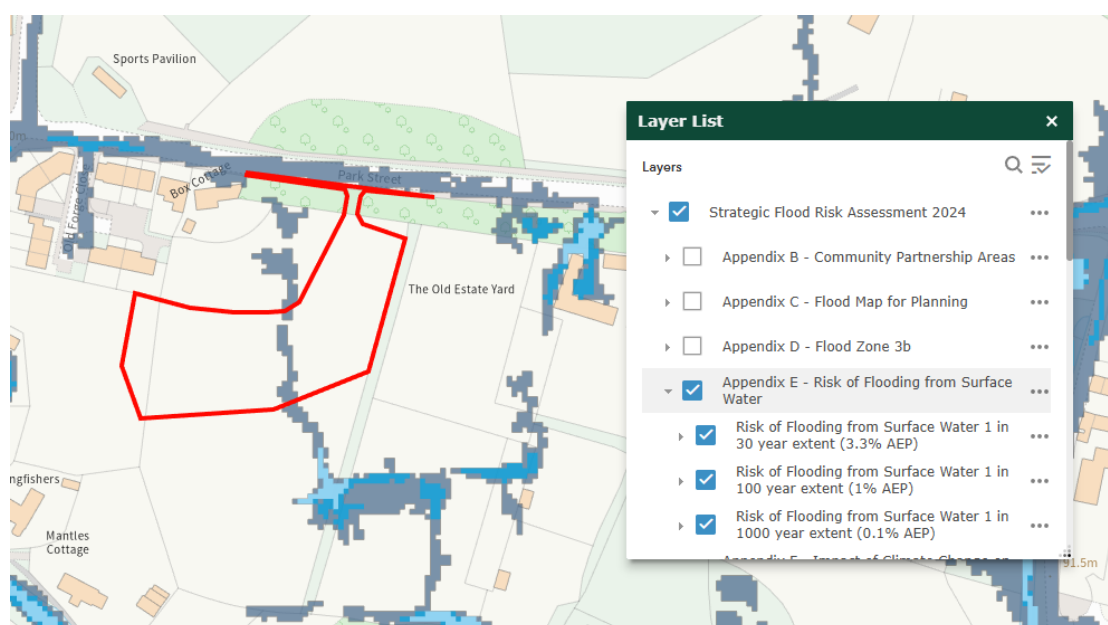
The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

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 developer, or agent working on their behalf, retains the responsibility for the checking of the design, calculations and details contained in the FRA and additional submitted information.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and has a low level of risk from fluvial flooding. The site has a low level of risk from surface water flooding and there is small portion at centre of the site and the access road located in front of the site falling within the 1 in 100-year flood extent.



SFRA mapping identifies the site as having a medium risk of groundwater flooding.

Groundwater levels and infiltration

The applicant has undertaken groundwater monitoring and reports that the highest recorded groundwater level is 1.2mbgl. However, the FRA Appendix indicates that groundwater was encountered at 0.9mbgl in trial pit S2. This raises concern that there may be insufficient clearance between the base of the permeable paving and the highest groundwater level, noting that a minimum separation of 1 m is required in accordance with Soakaway Guidance.

Given that the site's surface water management strategy relies entirely on effective infiltration through the permeable paving, this issue is particularly critical. We therefore request confirmation from the applicant on whether any overflow options are available from the permeable paving system, such as discharge to a nearby ditch/watercourse/existing surface water sewer. We also request that the applicant submits detailed cross-sections of the proposed permeable paving system to enable a clear assessment of the clearance between the base of the system and the highest groundwater level.

Exceedance flows

Exceedance routing has been shown on the drainage layout plan, indicating that overland flows across the site will generally be preserved and will continue to discharge off-site to the south, as is currently the case.

However, there is concern that future planning applications may come forward to develop the remaining land within the applicant's ownership. This could result in development to the south being affected by exceedance flows originating from the proposed scheme. This risk is heightened by the fact that the drainage strategy relies entirely on permeable paving, meaning that any maintenance or performance issues associated with the permeable paving could directly result in increased volumes of exceedance flows directed to the south.

We therefore request that the applicant provides more detailed exceedance flow routing plans, and that consideration should be given to measures along the southern boundary to intercept and manage exceedance flows, ensuring that any adjacent land or future development to the south is adequately protected.

Foul drainage

The site is not served by sewerage networks and therefore foul drainage will be dealt with using package treatment plants draining into drainage fields.

Emergency access and egress

The application includes only a basic indicative safe-access and egress route and indicates an intention to prepare a Flood Warning and Evacuation Plan. However, no detailed assessment of flood depths or hazard levels along the access routes has been provided.

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 proper review of the drainage and flood risk aspects of the proposal:

- Confirmation of any permeable paving overflow opportunities (to ditch/watercourse/existing sewer).
- Cross section drawings of all infiltration SuDS features that demonstrate at minimum 1m clearance between their base and the highest groundwater level.
- Detailed exceedance routing plan.
- Drainage strategy demonstrating that exceedance flows generated within the site will not increase flood risk to adjacent land.

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

- Evidence that the finished floor levels are at minimum of 150mm above surrounding ground levels.
- Details of the (foul) package treatment plants, including size, location, discharge arrangements, and maintenance regime.
- The access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

- Given that permeable paving maintenance is intended to be the responsibility of the property owner, this should be included in the deeds to the property.
- The application states that foul drainage will discharge to a private treatment system. This requires consultation with the EA, see the [EA guidance](#). The applicant can also contact the EA for pre-planning advice at swx.sp@environment-agency.gov.uk.
- The EA's standing advice for minor extensions will apply.
- 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.

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 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.