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|--------------------------|----------------|--------------|--------------------------|
| <b>To:</b>               | Julie Mitchell | <b>From:</b> | Drainage (Barney Taylor) |
| <b>Planning App Ref:</b> | PL/2026/00358  |              |                          |
| <b>Service Ref:</b>      | Drainage       |              |                          |
| <b>Date:</b>             | 29/05/2026     |              |                          |

## PROPOSAL

*Discharge of conditions (9 Partial Discharge - details of roads, footways, footpaths, verges, junction etc.), 10 (compliance to River Avon Mitigation scheme), 12 (CEMP), 13 (LEMP), 15 (scheme for discharge of surface water) & 16 (details of disposal of sewerage) of PL/2021/10503 – Residential development for up to 9 No. dwellings and associated vehicular access*

## SITE LOCATION

*Brick Hill Farm, 48 Bath Road, Warminster, BA12 8PF*

## APPLICATION DOCUMENTS REVIEWED

- Application Form
- Condition 9 – Site Plan
- Condition 9, 15 – Drainage Strategy Sheet 1
- Condition 12 – Construction Environmental Management Plan (CEMP)
- Condition 15 & 16 – Standard Construction Details
- Condition 15, 16 – Drainage Statement – Part 1, 2 & 3
- PL.2021.10503 – Decision Notice
- Supporting Statement
- PL/2025/09907: 4161 REM Planning Statement Rev A
- PL/2025/09907: 13270\_002\_C\_Site Plan
- PL/2025/09907: Covering Note responding to LLFA comments
- PL/2025/09907: DS 1-6 complete – Part 1, 2 & 3.

## Assessment

It should be noted that our comments below are reliant on the accuracy and completeness of all documents submitted by the applicant, we do not take any responsibility for incorrect data or interpretation made by the authors.

It's noted in Appendix F of the Condition 15, 16 – Drainage Statement – Part 2 that infiltration will not be a feasible means of surface water discharge. The LLFA accept that the infiltration rate calculated suggests that the rates are not appropriate for an infiltrating drainage strategy, however we would note the infiltrating testing is not compliant to BRE365 methodology, notably 3 tests at each trial pit, and assessing over the course of 1440 minutes (National Standards for SuDS [Standard 3: management of extreme rainfall and flooding](#), paragraph 3.14).

The applicant should note, the LLFA will not accept surface water flows being discharged into a highways drain. The applicant must ensure the drainage strategy is applying the surface water disposal hierarchy, outlined in the National Standards for SuDS: [Standard 1: runoff destinations](#), paragraph 1.2.

The applicant states in section 3.2.6 of the Condition 15, 16 – Drainage Statement – Part 1 that flows will be restricted to 2l/s to mitigate risk of blockages. In the LLFA's experience, flows can be restricted to 1l/s with appropriate maintenance. Noting the greenfield rate, while betterment will not be realistically achievable, the applicant will be required to restrict flows to 1l/s.

The applicant is required to provide further information regarding Condition 15. The applicant is required to demonstrate greater adherence to the National Standards for SuDS, and restrict the discharge rate to as low as feasible possible.

It's noted in section 4.2.3 of the Condition 15,16 – Drainage Statement – Part 1 that Wessex Water have confirmed they will accept foul flows into Roman Way foul sewer.

## ASSESSMENT OF THE PROPOSAL

### Context

The decision notice of PL/2021/10503 states the following conditions for which information is required as part of PL/2026/00358:

*9. No development shall commence on site until details of the estate roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, swept paths, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car parking and street furniture, including the timetable for provision of such works, have been submitted to and approved by the Local Planning Authority. The development shall be constructed and laid out in accordance with the approved details.*

*REASON: To ensure that the roads are laid out and constructed in a satisfactory manner.*

*10. The development hereby permitted shall not commence until evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation scheme, or an alternative approved mitigation package addressing the additional nutrient input arising from the development, has been submitted to, and approved in writing by the Local Planning Authority.*

*REASON: To accord with the Conservation of Habitats and Species Regulations 2017, and Wiltshire Core Strategy Core Policy 69.*

*12. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase in accordance with measures outlined in Section 5 of the Ecological Assessment (Greenwood Ecology, November, 2021) and Confidential Annex letter (Greenwood Ecology, Ref: 2020#027.2#BB).*

*REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.*

*13. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature (Wildlife Enhancement Zone, Hedgerow, bat and bird boxes) within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.*

*The LEMP shall also include details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.*

*REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.*

*15. No development shall commence on site until a scheme for the discharge of surface water from the site (including surface water from the access/driveway), incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first brought into use until surface*

*water drainage has been constructed in accordance with the approved scheme.*

*REASON: The matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.*

*Informative Note to the above condition: The applicant is required to evidence the following as part of the discharge of the condition:*

- In accordance with Wiltshire Council's betterment policy, the developer shall evidence how the post-development discharge rates for this greenfield development shall deliver a lower discharge rate betterment on pre-development discharge rates, when tested on the 1 in 1, 30 & 100+climate change event.*
- The applicant must demonstrate pluvial surface water flood risk has been considered, and mitigated within the drainage strategy.*
- The applicant must submit detailed cross and long section drawings of each of the SuDS features proposed, including the permeable paving.*
- The applicant must provide a detailed overland exceedance flow path drawing, demonstrating exceedance is managed onsite, mitigating flood risk to people and property.*
- The applicant must provide a construction management plan, detailing how pollution to groundwater and flood risk to people and property will be mitigated*
- The applicant must provide a maintenance plan for the surface water drainage system, including SuDS, detailing who will be responsible for maintenance, and the frequency of maintenance.*

*16. No development shall commence on site until details of the works for the disposal of sewerage (including the point of connection to the existing public sewer where necessary) have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be first occupied until the approved sewerage details have been fully implemented in accordance with the approved plans.*

*REASON: The matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure that the proposal is provided with a satisfactory means of drainage and does not increase the risk of flooding or pose a risk to public health or the environment.*

#### *Assessment*

Since our last response, the LLFA no longer require information on water quality and the drainage maintenance plan.

## RECOMMENDATION

Following a review of the information provided, the LLFA have no comments on conditions 9, 10, 12, 13 & 16.

Condition 15 cannot be discharged until the following information is submitted and accepted by the LLFA:

a) Surface Water Discharge: Wiltshire Council Betterment Policy:

The applicant must clarify the sewer type that surface water will be disposed to. The LLFA will not accept flows being discharged to a highway sewer. It is noted the applicant points towards Appendix E, however it is not clear there is an agreement in place for acceptance. The applicant must also confirm the highways drain connects into a surface water sewer.

The applicant has provided infiltration testing results, but this is not compliant with BRE365 testing methodology.

It is noted the applicant in Section 3.2.6 of the Condition 15,16 – Drainage Statement (Part 1) that “it is noted that modern flow restriction devices are now able to restrict flows to as low as 2l/s without introducing additional risk of blockage, therefore, flows for all storm events will be restricted to a maximum 2l/s subject to consent from the Highway authority”.

Previously the applicant had stated flows will be restricted to 2l/s. The applicant now proposes 1.5l/s discharge into the highways sewer. This is not acceptable to the LLFA as in the LLFA’s experience, flow can be restricted to 1l/s without increasing the risk of blockages, with an appropriate maintenance regime.

Noting the greenfield rates at the site, the LLFA accepts it is not feasible for the applicant to achieve betterment in line with Wiltshire Council’s Betterment Policy, however the applicant must demonstrate that the discharge rate is restricted to 1l/s, and that the surface water disposal hierarchy (Standard 1) is complied with.

b) National Standards for SuDS: [Standard 3: management of extreme rainfall and flooding](#):

The roundabout on Bath Road to the south of the site is situated in Flood Zone 3.

The applicant has stated gullies will intercept overland flow towards the highway, however the applicant must outline why a filter drain across the extent of the road is not preferred to more effectively mitigate increasing flood risk on the highway.

c) National Standards for SuDS: [Standard 2: interception](#):

It's noted the applicant has stated their proposals are compliant with Standard 2, however the applicant must provide calculations to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS.

d) National Standards for SuDS: [Standard 5: amenity](#) & [Standard 6: biodiversity](#):

It is noted the applicant has proposed raingardens to enhance the amenity value and potentially biodiversity benefit of the development. The applicant must provide detailed cross & long section drawings of the proposed raingardens.

- e) National Standards for SuDS: [Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity:](#)

We can agree with the applicant that the construction management plan can be provided as a pre-commencement conditions. The CMP must demonstrate how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction.

## INFORMATIVES

- *The applicant must ensure any feature of the drainage strategy that will be the responsibility of the landowner to maintain is clearly outlined in the title deeds of the property. The applicant should include the drainage strategy plan and a copy of the associated maintenance regime.*
- *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.*