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| <b>To:</b> | Development Management | <b>From:</b> | Rahul Dixit |
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|                          |               |
|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2025/10007 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 18/06/2026    |

## PROPOSAL

Outline planning permission: Some matters reserved.

Outline planning application for the erection of up to 77 dwellings, public open space, landscaping and sustainable urban drainage system, with vehicular access off Ashley Coombe. All matters reserved except for means of access.

## SITE LOCATION

Land off Ashley Coombe, Warminster, Ashley Coombe, BS12 9QU.

## 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 for Outline Planning Permission with some matters reserved (Dec 2025)
- Location Plan (Jan 2026)
- Illustrative Layout (Dec 2025)
- Design & Access Statement (Dec 2025)
- Flood Risk Assessment & Appendices (May 2026)
- Environment Agency Response (Jan 2026)

## 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 applicant has reconsulted with revised surface water drainage strategy, addressing the issues raised in the previous drainage response issued on 10/02/2026.

An updated FRA and drainage strategy has been submitted by the applicant in support of the planning application.

LLFA acknowledges that the updated drainage strategy proposes a discharge rate delivering a 30% betterment over the greenfield runoff rate. However, the Flood Risk Assessment (FRA) indicates that the hydraulic design has been based on a restricted discharge rate of 2.5 l/s, whereas the corresponding discharge rate for the 1 in 1-year event, with 30% betterment applied, should be 2.17 l/s.

The submitted hydraulic modelling results indicate that node S17 is flooding during the 1 in 100-year critical event, which presents a potential risk of exceedance flows impacting neighbouring properties as per the contours. This is not considered acceptable unless it can be clearly evidenced that flooding is contained within the site area and does not pose a risk to buildings or third-party land.

Additionally, results for the 1 in 1 year event and the 1 in 30-year event including climate change have not been provided, the applicant must provide an update hydraulic model assessment results as per correct controlled discharge rate with results pertaining to 1 in 1 year, 1 in 30 including climate change and 1 in 100 year including climate change. And if the proposed stormwater drainage system is allowed to flood, evidence must be provided that the flood will be safely managed within the site without increasing the flood risk to adjacent properties

The exceedance route drawing does not clearly define the overland flow paths. The blue arrows provided are widely spaced and appear schematic, and do not demonstrate continuous flow routes or how surface water will move in accordance with the site contours, spot levels, and level variations. Based on the contour levels, there is a potential risk of exceedance flows being directed towards adjacent properties however the flow arrows don't indicate the same, please refer to the figure below.



For LLFA assessment, a revised exceedance routing plan is required with closely spaced arrows demonstrating continuous, contour-aligned flow paths and movement of water across the site. The plan must identify all low points, include estimated exceedance flood depths at these locations, and confirm safe routing away from proposed and neighbouring properties.

As a mitigation measure, the response email from OGCE states that FFLs have been set above surrounding cover levels; however, a review of the drainage strategy drawings indicates that, at certain locations, the proposed FFLs are either below adjacent ground levels or do not provide sufficient freeboard, for example plot 14 & 15 (Please refer to figure below). A minimum uplift of 300 mm above surrounding ground levels should be ensured. The applicant is required to submit revised drawings demonstrating proposed topography and FFLs for all dwellings to demonstrate compliance and reduce residual flood risk.



The applicant proposes to discharge surface water to the Wessex Water sewer and is awaiting confirmation; however, it has not been demonstrated that the surface water drainage hierarchy has been appropriately applied or that higher-priority options have been exhausted. No BRE 365 infiltration testing or adequate groundwater assessment has been provided to assess the feasibility of infiltration. While the SFRA may identify a risk of groundwater flooding or groundwater impacting subsurface assets, for a site of this scale, site-specific evidence must be provided to demonstrate that that infiltration is not a viable option.

## 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:

- Evidence that the [surface water disposal hierarchy](#) has been applied, including the incorporation of rainwater harvesting in accordance with Standard 1 of the National Standards for SuDS:
  - BRE65 infiltration testing results must be provided
  - Ground water monitoring to determine the highest groundwater level (taking into account seasonal variations)
- Post development runoff rates for the site, in accordance with Wiltshire Council's betterment policy update, which can be found [here](#). An updated drainage strategy with correct restricted discharge should be provided.
- The site layout does not demonstrate that interception storage has been considered in accordance with [Standard 2](#) of the National Standards for SuDS. The applicant is required to justify why further source-control SuDS are not feasible at this site. The applicant must resubmit an updated layout and provide supporting evidence, including calculations, to demonstrate that runoff from each positively drained surface (for at least the first 5mm of rainfall) is intercepted through collection for reuse, infiltration, or storage within SuDS features, in compliance with the interception requirements of [Standard 2](#).
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

**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.**

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

- In accordance with Standard 1 of the National Standards for SuDS, rainwater harvesting should be considered as part of the drainage strategy. It is noted that the Outline/OGCE Statement makes reference to the use of water butts; however, the applicant must demonstrate this is reflected in the submitted drainage strategy drawings and overall plan.
- The applicant must propose further blue/green & source-control SuDS to increase the treatment train to intercepted surface water flows. While the applicant has demonstrated in Table 4 of the FRA that the water treatment process is compliant with the Simple Index Method, a more extensive treatment train would enable greater water quality benefits and decrease the reliance on the basin as a sole treatment provider.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.
- Confirmation from Wessex water that they will adopt the proposed drainage systems that is being offered for adoption.
- In accordance with Standard 1 of the National Standards for SuDS, the applicant must confirm that they have land ownership or appropriate easements in place for the lifetime of the development where the drainage network extends beyond the red line boundary to connect to a final outfall.

## INFORMATIVES

The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/owning-a-watercourse)".

The applicant should include in the title deeds for each property clearly stating that the ownership and responsibility for the operation and maintenance, as per maintenance regime, of all private drainage systems within the property boundary rest with the respective property owner and that shared sewers would be offered for adoption, or would be maintained as part of wider communal infrastructure by a management company funded by a communal service charge.

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.

To aid in the development of compliant drainage strategies, the following are recommended without prejudice. These are based on the [National Standards for SuDS](#). We would recommend also utilising the best practice guidance within *The SuDS Manual*, and *Getting SuDS Right from the Start*.

| Standard                                                | Best Practice Considerations                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Standard 1 – Drainage Hierarchy                         | <ul style="list-style-type: none"><li>• Retain and enhance existing natural drainage features where possible.</li><li>• Use site layout to maximize opportunities for infiltration and above-ground conveyance.</li><li>• Identify how communal rainwater harvesting can be utilised to help improve viability of inclusion.</li><li>• Identify whole-life cost-benefits such as water bill reductions for implementing rainwater harvesting.</li></ul> |
| Standard 2: Interception                                | <ul style="list-style-type: none"><li>• Use green roofs, permeable paving, rain gardens, and bioretention to maximize interception.</li><li>• Distribute source control features throughout the site for maximum effectiveness.</li><li>• Provide a maintenance plan to ensure interception features remain effective.</li></ul>                                                                                                                        |
| Standard 3: Management of Extreme Rainfall and Flooding | <ul style="list-style-type: none"><li>• Use topographical surveys to identify and preserve natural overland flow routes.</li><li>• Design SuDS features with freeboard and overflow routes.</li><li>• Ensure safe access and egress during extreme events.</li><li>• Consider overland flows originating from outside redline boundary</li><li>• Consider how the drainage systems will perform in the event of blockage and failure</li></ul>          |
| Standard 4: Water Quality                               | <ul style="list-style-type: none"><li>• Use vegetated SuDS (swales, ponds, wetlands) for effective pollutant removal.</li><li>• Include forebays or sediment traps upstream of main SuDS features.</li><li>• Provide a maintenance plan for regular removal of silt and debris.</li></ul>                                                                                                                                                               |
| Standard 5: Amenity                                     | <ul style="list-style-type: none"><li>• Use gentle side slopes, accessible paths, and seating to make SuDS features usable and attractive.</li><li>• Involve local communities in the design of SuDS spaces.</li></ul>                                                                                                                                                                                                                                  |
| Standard 6: Biodiversity                                | <ul style="list-style-type: none"><li>• Design SuDS to create wetland mosaics, wildlife corridors, and habitat connectivity.</li></ul>                                                                                                                                                                                                                                                                                                                  |

|                                                                                             |                                                                                                                                                            |
|---------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                             | <ul style="list-style-type: none"> <li>• Consider how SuDS can help provide wider BNG benefits / credits to the site</li> </ul>                            |
| Standard 7: Construction, Operation, Maintenance, Decommissioning, and Structural Integrity | <ul style="list-style-type: none"> <li>• Plan for safe access for maintenance.</li> <li>• Include decommissioning plans for temporary features.</li> </ul> |

The table below stipulates the information typically required at each application stage. Provision of the correct information will expedite the processing of applications by the drainage team.

| Pre-app | Outline | Full | Reserved matters | Discharge of conditions | Document to be submitted                                                                     |
|---------|---------|------|------------------|-------------------------|----------------------------------------------------------------------------------------------|
| ✓       | ✓       | ✓    |                  |                         | Flood Risk Assessment / Statement                                                            |
| ✓       | ✓       | ✓    |                  |                         | Drainage Strategy / Statement & sketch layout plan                                           |
|         | ✓       |      |                  |                         | Preliminary "Outline" hydraulic calculations                                                 |
|         | ✓       | ✓    |                  |                         | Ground investigation report (for infiltration)                                               |
|         | ✓       | ✓    | ✓                | ✓                       | Evidence of third party agreement for discharge to their system (consent to discharge)       |
|         |         | ✓    |                  | ✓                       | Maintenance program and on-going maintenance responsibilities                                |
|         |         | ✓    | ✓                | ✓                       | Detailed flood & drainage design drawings                                                    |
|         |         | ✓    | ✓                | ✓                       | Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters |
|         |         | ✓    | ✓                | ✓                       | Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change |

## 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.

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*Paddy O'Neill (AtkinsRéalis on behalf of Wiltshire Council Drainage).*