

Keith Sloan
1 The Shears
Witt Road
Winterslow
SP5 1DF
alktbh@icloud.com

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Lead Local Flood Authority
Wiltshire Council
County Hall, Bythesea Road
Trowbridge BA14 8JN

By email / planning portal

Copy to: Planning Case Officers for PL_2025_10022 and PL_2026_03223

Re: Surface-water drainage — representations on applications PL_2025_10022 and PL_2026_03223

Site: Land at Witt Road, Winterslow, Wiltshire

Dear Sir or Madam,

I am writing as a local resident to raise concerns about surface-water drainage in respect of the two applications above. These two sites sit on the same dry-valley (bourne) system as the consented scheme at the adjacent parcel (PL_2023_10274, the approved successor to PL_2022_07116). Because they drain to the same watercourse and the same low point, I would be grateful if the Lead Local Flood Authority (LLFA) would consider them together rather than in isolation. I am making separate representations on other (non-drainage) matters; this letter is confined to drainage.

1. The schemes are being assessed in isolation, with no integrated drainage design

Three related schemes drain this valley, each prepared as a self-contained design:

- PL_2023_10274 (3 dwellings, consented): infiltration SuDS / soakaways, supported by the 2019 drainage work (Bryan Jezeph, ref 1972) describing a 122 ha chalk catchment to the north and a roadside/field ditch.
- PL_2025_10022 (2 dwellings): drawing ACC-25104-01 Rev A (Aqua Callidus Consulting, 17 June 2026) — permeable paving (approx. 11.8 m³ storage) and two geocellular soakaways (SA1 and SA2), infiltrating development run-off to chalk on the plots, with an existing overflow noted at about 110.8 m AOD.
- PL_2026_03223 (5 dwellings): Drainage Strategy and Flood Risk Assessment (Aqua Callidus Consulting, ref 25168, 13 May 2026) — Tier-1 infiltration for development run-off, plus a new grassed channel (a “new ditch”, approx. 0.40 m deep on a gentle gradient) that carries the pre-existing valley overland flow — stated as about 211 l/s in the 1% AEP event including a climate-change allowance — through the site to an outfall at its south-west corner.

Each scheme claims, on its own, to be “no worse than the existing situation.” My concern is that there is no overall design and no defined, connected drainage channel across the three. The 10274 ditch is not formally linked to the 10022 drainage arrangement; the 10022 arrangement is not formally linked to the 03223 channel; and the 03223 channel discharges at the valley low point. No single party is shown as responsible for the continuous, end-to-end flow path, and the interfaces between the schemes are not designed, owned or maintained as one system. Notably, the same consultant prepared both 10022 and 03223 yet they remain unconnected designs.

2. The 03223 channel discharges toward an already high-risk receptor

The 03223 channel outfall lies at the south-west corner of that site (approximately NGR 424748, 132440), only some 20–30 m north of the retirement complex on Witt Road. The Environment Agency’s Risk of Flooding from Surface Water mapping shows a High-risk band reaching the outfall and the northern edge of that complex.

The applicant’s own Strategy (para 10.1) states only that the channel “mimics the existing run-off regime” — in other words, that it does not increase downstream flow, not that water does not leave the site. Concentrating and routing roughly 211 l/s to a single outfall immediately upstream of an occupied and potentially vulnerable site that is already in a High surface-water flood-risk zone warrants explicit assessment of the receiving ground and of the onward overland route. I do not consider “mimics existing” to be a sufficient answer where the receptor is this sensitive.

3. Climate-change allowances may be out of date for the upstream consented scheme

The 10274 drainage evidence dates from 2019 and will have used the climate-change rainfall uplifts current at that time. The Environment Agency revised its peak-rainfall allowances upward in 2022. A design checked only against the older, lower uplifts may be under-provided against the standard a new application would have to meet today. As 10274 forms the upstream context for both 10022 and 03223, I would ask that its assumptions be re-validated against the current allowances before the downstream schemes are relied upon as “no worse.”

4. Infiltration performance to chalk is not yet proven

All three schemes rely on infiltration to chalk. The 03223 geotechnical assessment (para 4.6) reaches “no definitive conclusion on chalk density.” If infiltration underperforms, the soakaways surcharge and more surface water is forced onto the conveyance and overland route toward the retirement complex. I would ask that verified infiltration testing (e.g. BRE Digest 365) at each soakaway location be required and secured by condition, rather than assumed.

5. Cumulative scale and the “minor application” threshold

Individually these are “minor” applications (2 and 5 dwellings), so the LLFA is not automatically a statutory consultee and no full surface-water drainage review is automatically triggered. But taken together with the consented 3-dwelling scheme, they amount to about 10 dwellings on a single valley — the scale at which one “major” application would attract statutory LLFA scrutiny. I would respectfully suggest that a sequence of minor applications

should not be allowed to avoid the cumulative assessment that a single combined scheme would receive, and I ask the LLFA to engage notwithstanding the minor classification.

What I am asking the LLFA to do

I would be grateful if the LLFA would:

1. assess the three related schemes cumulatively, as one hydraulic system, rather than in isolation;
2. require a defined, connected surface-water flow path across the sites, with exceedance flows (beyond the 1% AEP design event) routed and demonstrated to, and beyond, the retirement complex;
3. require verified infiltration testing for each soakaway, and re-validation of the design against the current Environment Agency climate-change allowances;
4. secure long-term ownership, maintenance and adoption responsibility for the conveyance channel/ditch by condition or agreement; and
5. if these matters cannot be satisfied, recommend refusal, or that determination be deferred pending a cumulative drainage assessment.

To assist, I enclose an indicative plan I have prepared (overleaf) showing the 03223 channel outfall, an indicative flow path, and the Environment Agency surface-water flood-risk bands in relation to the retirement complex. For the avoidance of doubt, I am a lay resident; the figures quoted above are taken from the applicants' own drainage documents and from Environment Agency flood mapping, and the enclosed plan is indicative only and not a hydraulic model.

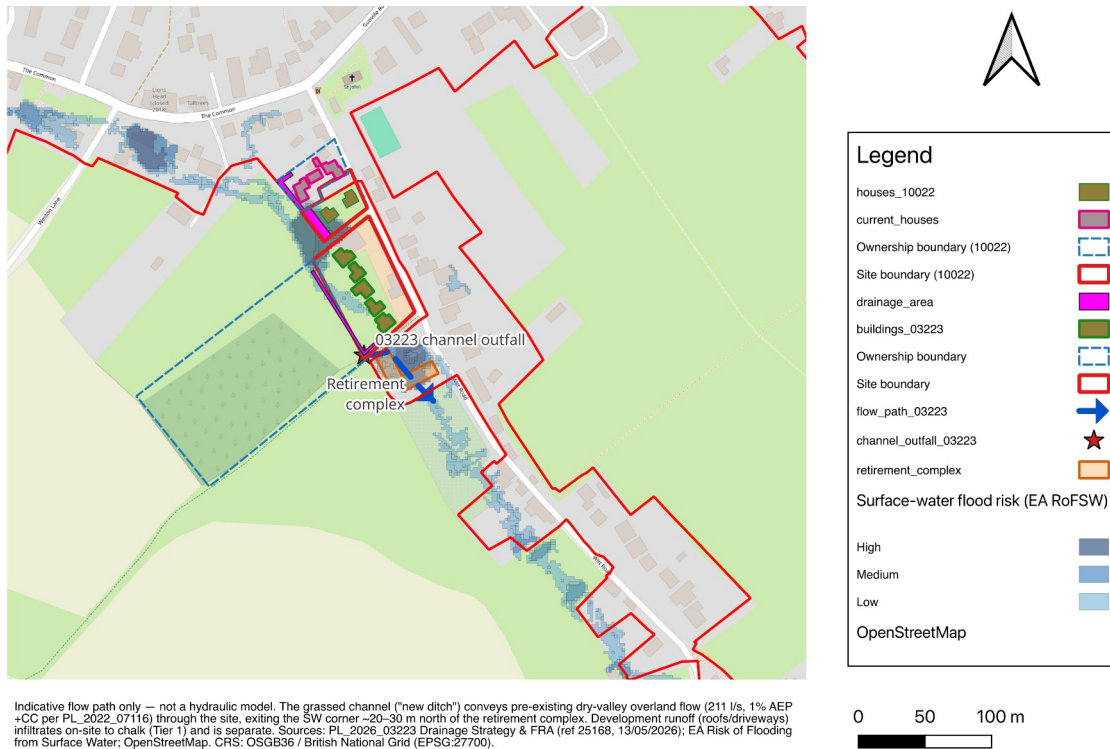
I would be grateful for confirmation of receipt, and for the LLFA's comments to be placed on the planning files for both applications.

Yours faithfully,

Keith Sloan

Enclosure: Indicative drainage flow-path plan

PL_2026_03223 — Drainage Flow Path & Downstream Surface-Water Flood Risk



Indicative only; not a hydraulic model. Sources: PL_2026_03223 Drainage Strategy & FRA (ref 25168); EA Risk of Flooding from Surface Water; OpenStreetMap. CRS: OSGB36 / British National Grid (EPSG:27700).