

# **REPRESENTATION ON FLOOD RISK, GROUNDWATER AND HYDROLOGICAL IMPACTS**

**Planning Application:** Home Farm, Warminster

**Application Reference:** PL/2026/02717

## **Representation submitted by**

Nicholas J. L. Tilt & Jane Offler,

[REDACTED]

Warminster

Wiltshire

BA12 9HG

1 July 2026

## **1. Introduction**

This representation objects to Planning Application PL/2026/02717 on the grounds that the applicant has not demonstrated that the proposed development can be accommodated without increasing flood risk, creating unacceptable uncertainty regarding groundwater behaviour, or adversely affecting the wider hydrological environment.

The objection is not based upon the fact that Home Farm lies within Flood Zone 1, nor upon opposition to sustainable drainage in principle. It is based upon the proposition that the application does not provide sufficient evidence for the Local Planning Authority to conclude that the proposed drainage strategy will operate safely and effectively throughout the lifetime of the development.

The application site forms part of Warminster's wider hydrological system within the upper River Wylye catchment. Flood risk at this location cannot be considered in isolation from groundwater, surface water, the underlying chalk aquifer, the River Wylye and the cumulative effects of continuing development across the town.

Whilst the applicant has submitted a Flood Risk Assessment, Ground Investigation Report, Sequential Test and Landscape Masterplan, these documents rely upon assumptions regarding groundwater behaviour and future drainage performance that have not been demonstrated with sufficient certainty to enable the Local Planning Authority to conclude that planning permission should be granted. The application therefore seeks planning permission before the evidence necessary to justify that permission has been satisfactorily established.

Accordingly, the applicant has not discharged the evidential burden necessary to demonstrate that the proposed development satisfies national planning policy, Core Policy 67 and the requirements for protecting the River Avon Special Area of Conservation ("SAC") and River Wylye Site of Special Scientific Interest ("SSSI").

## **2. Warminster's Strategic Flood Context**

Flood risk within Warminster is not a series of isolated engineering problems that can be resolved through successive site-specific Flood Risk Assessments.

It is the product of an interconnected hydrological system influenced by groundwater, surface water, the chalk aquifer, drainage infrastructure, the River Wylye and the cumulative effects of continuing development.

This wider context is important.

Warminster has experienced substantial residential growth in recent years through developments including the West Warminster Urban Extension, Cley Hill View, Grovelands and Brick Hill Farm. Further significant speculative proposals continue to come forward.

Each development has been accompanied by its own Flood Risk Assessment.

However, flood risk, groundwater and surface water do not recognise planning boundaries.

The cumulative consequences of continuing development have never been examined through a town-wide Level 2 Strategic Flood Risk Assessment for Warminster, despite the Environment Agency previously advising Wiltshire Council that such an assessment was required as part of the Local Plan evidence base. Whilst Wiltshire Council subsequently commissioned a Level 2 Strategic Flood Risk Assessment for selected settlements, Warminster was not included.

That omission matters because, without that strategic understanding, each successive planning application inevitably assesses only its own effects whilst the cumulative hydrological consequences across Warminster remain insufficiently understood.

The present application is another example.

The applicant seeks to demonstrate that Home Farm can safely accommodate 135 dwellings through a site-specific engineering assessment.

It cannot demonstrate the wider cumulative effects that development may have upon Warminster's interconnected hydrological system.

### **3. Home Farm's Hydrological Setting**

Bellway's own evidence demonstrates that Home Farm occupies a hydrologically sensitive location.

Bellway's Ground Investigation Report records that the site is underlain by a Principal Aquifer and describes it as an area of "high sensitivity in terms of groundwater resources." It further notes that the River Wylfe lies approximately 50 metres to the south at its closest point.

These are not the observations of an objector. They are the applicant's own assessment of the site's hydrogeological sensitivity. They substantially increase the evidential burden resting upon the applicant to demonstrate that the proposed drainage strategy can operate reliably in this location.

Bellway's Sequential Test states that groundwater "may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots."

The Landscape Masterplan (Appendix A, Figure A4) proposes the principal attenuation basin and associated drainage infrastructure within this same southern area. The application therefore relies upon infiltration in precisely the part of the site that Bellway itself identifies as presenting the greatest groundwater sensitivity. The application does not explain why that acknowledged constraint no longer gives rise to material uncertainty.

That same southern area is intended to accommodate the principal attenuation basin, swales, open space and the site's primary drainage infrastructure.

The application therefore proposes to locate its principal drainage infrastructure precisely within the part of the site that Bellway identifies as being most susceptible to groundwater emergence. That does not automatically make the proposal unacceptable. It does, however, substantially increase the evidential burden upon the applicant to demonstrate that groundwater behaviour has been fully characterised and that the proposed drainage strategy has been shown to operate reliably throughout the lifetime of the development.

The submitted evidence does not provide that level of confidence.

The proposed attenuation basin is located immediately south of the principal area of residential development and directly opposite existing properties on the northern side of Boreham Road.

The successful operation of the proposed drainage strategy is therefore not simply an engineering consideration confined within the application boundary. It is fundamental to the protection of both the proposed development and the existing community immediately surrounding the site.

Should the assumptions regarding groundwater behaviour, infiltration capacity or long-term drainage performance prove incorrect, the consequences would not be confined to the attenuation basin itself. Surface water would be expected to follow the existing topography, including Boreham Road and the adjoining residential area.

The application relies upon the conclusion that such circumstances will not arise. However, for the reasons set out above, the submitted evidence does not demonstrate that the assumptions upon which that conclusion depends have been established with sufficient certainty.

Given the proximity of existing residential properties, the River Wylfe and the proposed drainage infrastructure, that uncertainty is a material planning consideration.

The proposed attenuation basin performs a critical function. It is intended to protect the proposed development, existing residential properties on Boreham Road, the adjoining highway network and the River Wylfe downstream. In these circumstances, the Local Planning Authority should expect a high degree of confidence that the assumptions upon which its operation depends have been fully demonstrated. The submitted evidence does not provide that confidence.

This is not a decision that can easily be revisited. Once planning permission has been granted and the development constructed, any shortcomings in the understanding of groundwater behaviour or long-term drainage performance cannot be remedied by revisiting the principle of development. That is precisely why the necessary evidence should accompany the application itself rather than be left to future investigation or the discharge of planning conditions.

The relationship between the application site and the River Wylfe reinforces this conclusion.

The proposed attenuation basin lies approximately 85 metres north of the River Wylfe, an internationally important chalk stream forming part of the River Avon SAC and SSSI.

Photographs included within Appendix A record recent flooding on Boreham Road at the proposed site access (Appendix A, Figure A1) and across the adjoining field immediately south of Boreham Road (Appendix A, Figure A2) directly opposite the proposed attenuation basin. The accompanying drone imagery (Appendix A, Figure A3) further demonstrates that the southern part of the site, where the attenuation basin is proposed, occupies the natural low point within the landscape and remained inundated for a prolonged period following recent winter flooding.

These photographs are not relied upon to redefine the site's Flood Zone classification.

They are relied upon because they illustrate the existing hydrological behaviour of the landscape into which the applicant proposes to introduce infiltration-based drainage infrastructure immediately adjacent to one of England's most important chalk streams.

#### **4. The Submitted Flood Evidence Does Not Resolve Material Uncertainty**

The application relies principally upon the Flood Risk Assessment (Ardent, April 2026), the Ground Investigation Report (Wilson Associates, March 2026), the Sequential Test (DPP, April 2026) and the Landscape Masterplan to demonstrate that flood risk can be satisfactorily managed.

Taken individually, each document addresses an important aspect of the site.

Taken together, however, they do not demonstrate that the proposed development can be accommodated without unacceptable uncertainty regarding groundwater behaviour, cumulative flood risk and the long-term performance of the proposed drainage infrastructure.

This is particularly important because the application does not propose a conventional piped drainage solution. It relies upon infiltration-based sustainable drainage infrastructure located within the lowest and most hydrologically sensitive part of the site immediately adjacent to the River Wylfe.

The applicant's own evidence demonstrates why this matters.

Bellway's Ground Investigation states that groundwater monitoring was "ongoing at the time of writing" and that additional monitoring results would become available following completion of the report.

The application nevertheless invites the Local Planning Authority to conclude that the proposed infiltration-based drainage strategy is acceptable before the groundwater evidence upon which that conclusion depends has been completed. That is a material evidential gap.

Groundwater behaviour is therefore acknowledged by the applicant as a matter requiring continuing investigation.

At the same time, the Flood Risk Assessment concludes that infiltration drainage can be successfully accommodated on the site. Bellway therefore asks the Authority to accept two propositions simultaneously: first, that groundwater conditions required further investigation; secondly, that the proposed infiltration strategy had already been demonstrated to be acceptable. The application does not reconcile those two positions.

That is a material evidential gap.

The application should therefore be determined on the basis of the evidence presently before the Local Planning Authority, not upon the expectation that material uncertainties will be resolved through future investigation, detailed design or the discharge of planning conditions. Conditions are not a substitute for evidence that is fundamental to determining whether the principle of development is acceptable.

The application similarly relies upon future technical approvals and detailed design to demonstrate that the drainage proposals can ultimately be delivered. Such an approach may be appropriate where the principle of development has already been established.

It is not an adequate substitute for the evidence required to demonstrate that the principle of development is acceptable in the first place.

The burden rests with the applicant to demonstrate that the proposed development can be accommodated safely.

It does not rest with the Local Planning Authority to assume that matters requiring further investigation or future approval will ultimately prove capable of satisfactory resolution.

## **5. Groundwater, Climate Change and Long-Term Drainage Resilience**

The Flood Risk Assessment models rainfall allowances for climate change. However, the long-term resilience of the proposed drainage strategy also depends upon groundwater behaviour, infiltration performance and seasonal groundwater response. Bellway's own evidence acknowledges groundwater sensitivity whilst proposing infiltration infrastructure within the most hydrologically sensitive part of the site. Material uncertainty therefore remains.

The successful operation of the proposed drainage strategy also depends upon groundwater behaviour, infiltration capacity and the continued performance of the attenuation basin and swale network throughout the lifetime of the development.

Bellway's own evidence identifies the southern part of the site as being susceptible to groundwater emergence and ponding.

The Landscape Masterplan shows that this is precisely where the principal attenuation basin and drainage infrastructure are proposed. Bellway has therefore proposed to locate the principal drainage infrastructure within the part of the site where its own evidence identifies the greatest potential for groundwater emergence. Climate change allowances increase the importance of demonstrating that this strategy will remain effective throughout the lifetime of the development. The submitted evidence does not demonstrate that this has been established with sufficient certainty.

The application therefore depends upon assumptions regarding groundwater behaviour at the point where those assumptions matter most.

The submitted evidence does not demonstrate that those assumptions have been established with sufficient certainty to justify planning permission.

This uncertainty assumes increasing importance when considered alongside the effects of climate change.

More frequent extreme rainfall events, prolonged periods of saturation and changing seasonal groundwater behaviour place increasing demands upon infiltration-based drainage systems.

The application demonstrates that these matters have been considered.

It does not demonstrate that they have been satisfactorily resolved.

## **6. The River Wylfe, the River Avon SAC and the Precautionary Principle**

The River Wylfe is one of England's internationally important chalk streams and forms part of the River Avon Special Area of Conservation and Site of Special Scientific Interest.

The proposed attenuation basin lies approximately 85 metres from this protected watercourse.

The ecological value of the River Wylfe depends upon the interaction between groundwater, the chalk aquifer and surface water.

Consequently, the hydrological relationship between the application site and the River Wylfe is itself a material planning consideration.

The application proposes infiltration-based drainage immediately upslope of this internationally protected environment.

Bellway's own reports acknowledge the sensitivity of the groundwater environment and identify the southern part of the site as being susceptible to groundwater emergence.

Those acknowledgements substantially increase the evidential burden resting upon the applicant. Bellway's own reports therefore establish both the environmental sensitivity of the receiving environment and the hydrogeological sensitivity of the proposed drainage location. In these circumstances, the Local Planning Authority should expect particularly robust evidence before concluding that the proposal presents no unacceptable risk to the River Wylfe or the River Avon SAC.

The application must demonstrate that the proposed drainage strategy has been shown to operate reliably without creating unacceptable uncertainty regarding the hydrological processes upon which the River Wylfe depends.

The submitted evidence does not demonstrate that this standard has been achieved.

This objection does not suggest that harm to the River Wylfe has been demonstrated.

It concludes that the applicant has not demonstrated, through complete and sufficiently robust evidence, that such harm can confidently be excluded.

Where internationally protected habitats are concerned, unresolved uncertainty is itself a material planning consideration.

## **7. Planning Balance and Conclusions**

The determination of this application is not simply a question of whether the proposed attenuation basin has been appropriately sized or whether the site lies within Flood Zone 1.

The planning question is considerably wider.

The application is not deficient because sustainable drainage cannot work. It is deficient because Bellway has not demonstrated, through its own evidence, that the proposed drainage strategy has been shown to work with sufficient certainty on this site, under these hydrogeological conditions and in this environmentally sensitive location.

The Committee is being asked to conclude that a major residential development can be accommodated safely within Warminster's interconnected hydrological system, immediately adjacent to an internationally protected chalk stream, despite acknowledged groundwater sensitivity, the absence of a town-wide Level 2 Strategic Flood Risk Assessment, continuing

cumulative development across the settlement and reliance upon further investigation and detailed design following the grant of planning permission.

Bellway's own evidence identifies the southern part of the site as the area of greatest groundwater emergence risk. It is within that same area that the application proposes its principal attenuation basin, swales and principal drainage infrastructure. The successful operation of that infrastructure is fundamental not only to the proposed development itself, but also to the protection of existing residential properties on Boreham Road, the adjoining highway network and the downstream River Wylfe.

Taken individually, each of the uncertainties identified within the application may appear capable of resolution. Taken together, however, they create a level of material uncertainty that the submitted evidence fails to overcome.

The issue is therefore not whether sustainable drainage can operate in principle. It is whether this application demonstrates, with sufficient certainty, that the proposed drainage strategy will operate safely on this site, under these hydrogeological conditions, without creating unacceptable consequences for existing communities or the River Wylfe.

This is not a decision that can easily be revisited. Once planning permission has been granted and the development constructed, any shortcomings in the understanding of groundwater behaviour, infiltration performance or long-term drainage resilience cannot be remedied by revisiting the principle of development. That is precisely why the evidence necessary to demonstrate the acceptability of the proposal should accompany the application itself rather than be left to future investigation, detailed design or the discharge of planning conditions.

The applicant has sought to resolve what is fundamentally a strategic hydrological issue through a site-specific engineering assessment. Whilst that assessment provides important technical information, it does not demonstrate that the wider cumulative hydrological consequences of development across Warminster have been sufficiently understood, nor that the assumptions regarding groundwater behaviour upon which the proposed drainage strategy depends have been established with the degree of confidence necessary to support the grant of planning permission.

Accordingly, the applicant has not discharged the evidential burden necessary to demonstrate that the proposed development satisfies the requirements of national planning policy, Core Policy 67 or the Habitats Regulations. In the absence of that evidence, the Local Planning Authority cannot reasonably conclude that flood risk, groundwater impacts and the hydrological integrity of the River Wylfe and River Avon SAC have been satisfactorily addressed.

For these reasons, planning permission should be refused.

## Appendix A – Recent Flooding Evidence

### Flooding Figure A1

- Floodwater across Boreham Road at the proposed Home Farm access.
- Date January 2026
- East along Boreham Road



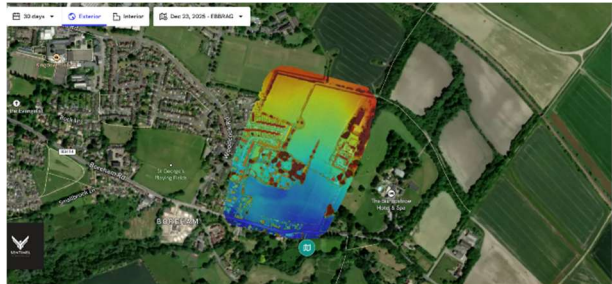
### Flooding: Figure A2

- Field south of Boreham Road opposite Home Farm Lane.
- Date January 2024
- South across Bishopstrow Conservation Area



### Aerial View Home Farm: Figure A3

- Drone photograph showing prolonged inundation of the southern part of the application site.
- Date: December 2025



### Aerial View Home Farm: Figure A4

- Wider aerial photograph showing the relationship between the proposed attenuation basin, Boreham Road and the River Wylfe
- River Wylfe shown in blue



## **Appendix B – Key Extracts from the Applicant's Technical Evidence**

### **B1 – Flood Risk Assessment**

This appendix identifies the principal passages within the applicant's technical evidence relied upon within this representation.

#### **Document**

- Flood Risk Assessment (Arden Consulting Engineers, April 2026)

#### **Key matters relied upon**

- Conclusions regarding the acceptability of the proposed drainage strategy.
- Climate change allowances.
- Infiltration-based drainage proposals.

### **B2 – Ground Investigation Report**

#### **Document**

- Ground Investigation Report (Wilson Associates, March 2026)

#### **Key matters relied upon**

- Principal Aquifer.
- High sensitivity in terms of groundwater resources.
- Groundwater monitoring was ongoing.
- Hydrogeological conditions.

### **B3 – Sequential Test**

#### **Document**

- Sequential Test (DPP Planning, April 2026)

#### **Key matters relied upon**

- Groundwater may emerge at significant rates.
- Groundwater may pond within topographic low spots.
- Groundwater emergence mapping.

### **B4 – Landscape Masterplan**

#### **Document**

- Landscape Masterplan (April 2026)

#### **Key matters relied upon**

- Location of attenuation basin.
- Swales.
- Primary drainage infrastructure.
- Relationship to the southern part of the site.

Note: The above extracts are relied upon because they demonstrate, through the applicant's own evidence, the hydrogeological sensitivity of the site, the proposed location of the principal drainage infrastructure and the continuing uncertainty regarding groundwater behaviour referred to throughout this representation.