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Planning App Ref:	PL/2026/03045
Service Ref:	Drainage
Date:	10/06/2026

PROPOSAL

Outline planning application for the erection of up to 49 dwellings with associated access, public open space, landscaping, drainage and associated infrastructure (all matters reserved except access).

SITE LOCATION

Land off Damask Way, 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
- Design and Access Statement
- Existing Site Layout (3 of 3)
- Flood Risk Assessment and Drainage Strategy
- Illustrative Layout (3 of 3)
- Location Plan

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.

According to the Flood Risk Assessment (FRA), the site lies within the Flood Zone 1 and is at low risk of fluvial and groundwater flooding.

On review of the Design and Access Statement and the FRA and Drainage Strategy, it is noted that there are discrepancies regarding the total site area. The Design and Access Statement states that the total site area is 3.51ha whilst the FRA and Drainage Strategy states that the total site area is 2.2ha. There are also discrepancies in the developable area, in that the Design and Access Statement indicates 1.36ha proposed for development, whilst the greenfield runoff calculations consider 1.9ha. The applicant should clarify these areas to ensure that the runoff calculations are accurate.

The drainage strategy prioritises discharging surface water to soakaway features where possible but also incorporates a positive drainage system to capture runoff from areas with poor infiltration potential and convey them to an attenuation tank, from which they are discharged to a ditch at a restricted rate. The LLFA are satisfied with this strategy in principle, but request that the applicant to submit detailed results of their ground investigations and infiltration testing to a) confirm that soakaways are located in areas with sufficient infiltration rates and b) to evidence that infiltration potential across the site is being maximised in accordance with Standard 1 of the National Standards for SuDS.

Whilst the proposed discharge rate to the ditch provides betterment in accordance with Wiltshire Council's policy, the northern part of the site does not appear to lie within the natural catchment of the receiving ditch. The applicant should therefore provide a catchment plan identifying existing drainage catchments and confirming whether any catchment transfer is proposed. If catchment transfer is occurring, the discharge rate may require revision to ensure runoff to the ditch is not increased above existing conditions.

In addition, detailed hydraulic calculations are not provided for proposed stormwater network, permeable pavement and soakaways. The applicant will be required to submit hydraulic calculations to demonstrate the performance of the drainage system. Given that surface water is proposed to discharge to a ditch, the calculations should also demonstrate that surcharged outfall conditions have been considered and that the drainage system can continue to operate effectively during periods of elevated water levels within the receiving watercourse.

The applicant will also be required to provide evidence that the site layout allows for interception storage to be provided to capture the first 5mm of rainfall, in accordance with Standard 2 of the National Standards for SuDS.

The submitted Flood Risk Assessment (FRA) notes that rainwater harvesting (RWH) is proposed as part of the development. While the outline drainage strategy does not currently provide details of how the RWH system will be incorporated, it is acknowledged that the applicant intends to include this measure within the scheme. The applicant should be aware that the provision of rainwater harvesting will be under Standard 1 of the National Standards for SuDS, and further details should be provided at the detailed design stage to demonstrate compliance.

Whilst finished floor levels have been provided, an exceedance flow plan has not been submitted. The applicant should provide an exceedance flow plan demonstrating the routing and management of flows to ensure that property, infrastructure, and vulnerable areas are not adversely affected by surface water flooding.

RECOMMENDATION

1. 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 the total site area, including a clear breakdown of the area proposed for development.
- Catchment plan identifying existing drainage catchments, confirming whether any catchment transfer is proposed, and demonstrating that runoff discharged to the receiving ditch will not exceed existing conditions.
- 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](#) of the National Standards for SuDS.
- Evidence that disposal of surface water via infiltration is being maximised in accordance with Standard 1 of the National Standards for SuDS, through the provision of:
 - BRE65 infiltration testing results and trial pit location details must be provided
 - Ground water monitoring to determine the highest groundwater level (taking into account seasonal variations)
- Detailed surface water drainage calculations demonstrating that:
 - The 1 in 30-year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 years plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
 - The site has been designed to ensure that flows in excess of the 1 in 100-year rainfall event are managed in exceedance routes that minimise the risks to people and property.
 - Evidence that the effect of surcharged outfall conditions has been considered.
- A detailed post-development exceedance flow plans demonstrating that flood risk is not increased on site or elsewhere as a result of the development. The plans shall be supported by existing and proposed site topographical levels to clearly show overland flow paths, localised ponding and exceedance routing.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H
- The applicant stated that maintaining elements of the drainage strategy may be the responsibility of individual plot owners. The applicant must ensure the drainage strategy, and a copy of the detailed maintenance regime, is included in the title deeds of each property.
- Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

- 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.

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.