

LLFA Response to Representation

Dear Mr Sloan,

Thank you for your representation dated 29 June 2026 regarding applications PL_2025_10022 and PL_2026_03223 and the potential cumulative drainage effects within the Witt Road dry valley system. The Lead Local Flood Authority (LLFA) has reviewed the matters raised in your correspondence.

The LLFA acknowledges that the developments are located within the same local catchment. However, in assessing flood risk it is necessary to distinguish between existing overland flow arising from the wider upstream catchment and runoff generated by the proposed developments themselves.

The LLFA has considered each of the matters raised under the section entitled "What I am asking the LLFA to do". For clarity, our response to each point is set out below.

Response to Point 1 – Cumulative Assessment. The LLFA has considered the relationship between the developments and their drainage strategies. The presence of multiple developments within the same catchment does not, in itself, demonstrate a cumulative increase in flood risk. The key consideration is whether the developments collectively increase runoff rates, runoff volumes, flood depths, flood extents or flood hazard beyond the existing situation.

The LLFA does not consider that the existence of three developments within the same catchment automatically requires a combined hydraulic assessment. The relevant planning test is whether each development demonstrates that it will not increase flood risk elsewhere. Existing dry-valley flows arising from the wider catchment are not, in themselves, evidence of a cumulative development impact.

Where development runoff is managed on site and there is no increase in flood risk elsewhere, the developments can generally be assessed on their individual merits.

Response to Point 2 – Connected Flow Path and Exceedance Routing. The principal valley flow identified within your representation appears to relate to an existing catchment runoff pathway rather than runoff generated by the proposed development. Based on the submitted drainage information, the proposed channel is intended to preserve and convey existing dry-valley flows through the site. The LLFA will review whether existing conveyance routes are maintained and not obstructed by development.

Response to Point 3 – Infiltration Testing and Climate Change. The LLFA will review whether sufficient infiltration testing has been undertaken to demonstrate the suitability of infiltration drainage proposals and whether the drainage design has been assessed using

the currently applicable climate change guidance and rainfall allowances. These are standard considerations in the technical review process.

Response to Point 4 – Ownership and Maintenance. The LLFA agrees that long-term management and maintenance of drainage infrastructure is an important consideration. Where necessary, maintenance requirements may be secured through planning conditions, management plans or other appropriate mechanisms.

Response to Point 5 – Refusal or Deferral. The LLFA will make its formal recommendation based on whether the submitted drainage information demonstrates an acceptable drainage strategy and whether residual flood risk can be managed appropriately. At present, the matters raised regarding cumulative development do not, on their own, provide evidence of an unacceptable increase in flood risk.

The LLFA notes that the drainage strategy for the development indicates that runoff from new impermeable areas is intended to be managed through infiltration-based measures. Consequently, any cumulative development assessment should focus on whether the proposals increase flood risk relative to the existing situation, rather than on the existence of natural catchment flow pathways which would occur irrespective of the proposed development.

Your representation will be taken into account as part of the planning process and will be retained on the relevant planning files.

Yours sincerely,

Rohit Singh

Principal Technical Officer Drainage Planning

Lead Local Flood Authority

Wiltshire Council