

To:	Becky Jones	From:	Drainage (Cecily Austin)
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Planning App Ref:	PL/2026/04207
Service Ref:	Drainage
Date:	27/08/2026

PROPOSAL

Outline planning permission (with all matters reserved except access) for the erection of up to 110 dwellings, together with access from Church Road, infrastructure including landscaping and children's play provision, a sustainable urban drainage system (SuDS), and associated utility buildings.

SITE LOCATION

Land East of Church Road, Laverstock, Salisbury

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

- Flood Risk Assessment
- Parameters Plan
- Planning Statement

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

Flood Risk Review

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.

It is noted that the site is not affected by any significant sources of flood risk. The submitted Flood Risk Assessment has considered pluvial, fluvial, sewer, artificial and groundwater flood risk sources, and the findings indicate that the proposed development would not be adversely affected by flooding.

Drainage Review

It is noted that the applicant proposes to dispose of surface water via infiltration. Based on a review of the infiltration testing and supplementary ground investigation data provided within the Flood Risk Assessment appendices, it is not considered that infiltration has been demonstrated to be feasible at this stage. Consequently, the LLFA objects to the application on these grounds.

The basis for this conclusion is set out below:

- The site is identified as being at risk from soluble rock risk, meaning that the area may be susceptible to dissolution and associated ground instability. This concern is further reinforced by the collapse of one of the trial pits during infiltration testing, further indicating potential ground instability in the area.
- Groundwater was encountered in three of the four boreholes presented within Appendix D. Groundwater was recorded at approximately 1.0m below ground level in BH01, which is located in the vicinity of the proposed infiltration basin. A minimum 0.7m unsaturated zone should be maintained between the base of an infiltration feature and the groundwater table. Given that the proposed basin is 1.2m deep, it is anticipated that groundwater may be present at, or in close proximity to, the base of the basin, raising concerns regarding the feasibility of infiltration at this location.
- Infiltration testing was undertaken at three locations however, only one pit (IT01) is shown to have been tested using the three consecutive fills required by BRE365, with the final test abandoned following collapse of the trial pit. The remaining trial pits were subject to a single fill test only, which is insufficient to demonstrate infiltration performance.
- Furthermore, the infiltration testing was undertaken at depths between 2.65m to 3.50m bgl, which are deeper than the proposed infiltration features. Additional testing

at representative depths should therefore be undertaken to demonstrate the viability of the proposed design.

- The site is located within a Principal Bedrock Aquifer, as identified by the DEFRA MAGIC mapping tool (<https://magic.defra.gov.uk/>). As a result, infiltration presents a groundwater pollution risk. Appropriate water quality treatment and pollution mitigation measures would therefore need to be demonstrated, and consultation with the Environment Agency may be required.

The proposed infiltration strategy therefore does not comply with the Wiltshire Council requirements, NPPF, PPG, or National Standards for SuDS.

To overcome this objection, the applicant must provide sufficient evidence to demonstrate that infiltration is feasible and address all of the concerns outlined above. Should the applicant be unable to demonstrate the viability of infiltration, an alternative surface water drainage strategy should be submitted which incorporates attenuation storage and discharge to a suitable outfall.

RECOMMENDATION:

Object

Due to issues with the infiltration proposals, discussed in the drainage assessment section above, the LLFA currently objects to these proposals on the grounds that infiltrating at this site is neither viable nor safe.

In order to overcome this objection, the applicant will need to provide:

- Further investigation into the soluble rock risk identified on site, including evidence that dissolution and associated ground instability will not adversely affect the proposed infiltration drainage system. Additional geotechnical assessment should be undertaken as appropriate, and the drainage design should incorporate any necessary easements or mitigation measures identified by the investigation
- Evidence demonstrating that a minimum 0.7m unsaturated zone can be maintained between the base of any infiltration feature and the maximum recorded groundwater level. This may require further groundwater monitoring, revisions to the proposed SuDS design, relocation of infiltration features, or a reduction in feature depth
- Updated infiltration testing undertaken in accordance with BRE365, including a minimum of three consecutive test fills at each trial location, with testing undertaken at depths representative of the proposed infiltration features
- Detailed water quality and treatment proposals demonstrating that infiltration will not pose an unacceptable risk to the underlying Principal Bedrock Aquifer. This should include details of the proposed treatment train, any pollution mitigation measures, and confirmation of any Environment Agency requirements or consultation outcomes

If the applicant is unable to provide the information requested above, or if the additional investigations further demonstrate that infiltration is not feasible, a revised surface water drainage strategy will be required. This should propose an attenuation-based drainage solution, with discharge to an appropriate outfall in accordance with the surface water drainage hierarchy.

The application will be reviewed further, and any additional recommendations or conditions will be provided once the requested information, or an alternative drainage strategy, has been submitted.

INFORMATIVES

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.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

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.