

To:	Andrew Thomas	From:	Drainage Team
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Planning App Ref:	PL/2026/02266
Service Ref:	Drainage
Date:	18/08/2026

PROPOSAL

Full planning permission for erection of 9 residential dwellings, access, parking, gardens, landscaping and associated works.

SITE LOCATION

Land south of, Park Street, Warminster

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	x
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Landscape Detail Plan
- Location - Site Plan
- Planning Statement
- Plot 1 Proposed Plans
- Plot 2 Proposed Plans
- Plot 3 Proposed Plans
- Plot 4-5 Proposed Plans
- Plot 6-7 Proposed Plans
- Plot 8-9 Proposed Plans
- Design and access statement
- Flood risk assessment
- Flood Risk Assessment Addendum
- Proposed Site Plan
- Proposed Site Plan-2
- Surface Water Drainage Strategy
- Street Scenes & Sections Sheet 1
- Street Scenes & Sections Sheet 2

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.

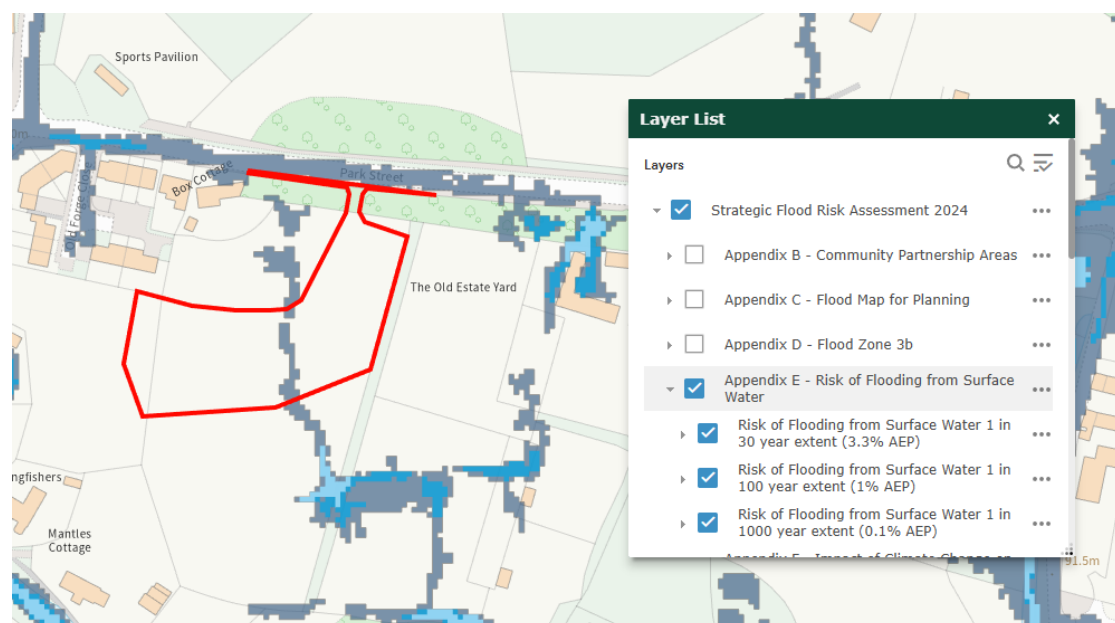
The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

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.

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and has a low level of risk from fluvial flooding. The site has a low level of risk from surface water flooding and there is small portion at centre of the site and the access road located in front of the site falling within the 1 in 100-year flood extent.



SFRA mapping identifies the site as having a medium risk of groundwater flooding.

Groundwater levels and infiltration

Groundwater encountered within Trial Pit S2 at 0.9mbgl corresponds to an elevation of approximately 92.15-92.20 mAOD, which is consistent with the highest groundwater level recorded across the site. The drainage design has been developed using this groundwater level, with the lowest base level of the permeable paving system set at 93.20 mAOD. This provides a minimum vertical separation of 1.0 m between the base of the infiltration system and the highest recorded groundwater level, in accordance with current infiltration drainage guidance.

A detailed cross-section of the proposed permeable paving system has been submitted and demonstrates compliance with the required 1.0 m groundwater clearance.

Exceedance flows

The applicant has undertaken further hydraulic modelling, which confirms that during the 1 in 1,000 year rainfall event, runoff remains contained within the drainage system below ground, with no flooding predicted. Minor exceedance flooding is only predicted when additional climate change allowances are applied to the 1 in 1,000 year event. This significantly exceeds the

required design standard and demonstrates that the drainage system provides additional capacity.

It is noted that an existing surface water flow path crosses the centre of the site. This flow path originates from land to the north and conveys overland runoff through the site. While the proposed dwellings are located outside this area of flood risk, it is unclear whether these off-site runoff volumes have been accounted for within the drainage and storage calculations, given that they do not originate from the site itself. The permeable paving should be designed to store both existing flood volumes and flood volumes arising from the development.

The applicant has also confirmed that there are no proposals for further development on the land to the south of the site, which is within their ownership, that could be affected by any changes to overland flow routes resulting from the development. However, there is no mechanism to guarantee that this land will remain undeveloped in the future. Regardless of future land use, we are satisfied that the proposed drainage system ensures that overland flow off the south of the site will not be increased beyond the existing scenario.

Finished Floor Levels

As noted in the FRA, all finished floor levels will be set 150mm above adjacent ground levels. The Landscape plan has been updated to show proposed finished floor levels.

Foul drainage

The site plan has been updated to show the location of the proposed package treatment plants and their drainage fields. Details of the plants are included within the Nutrient Neutrality Assessment.

Emergency access and egress

The SFRA indicates only limited surface water flooding during the 1 in 1,000 year event, confined to the carriageway and not affecting adjacent footways. Safe pedestrian access would therefore remain available, with flood depths unlikely to exceed kerb height. Accordingly, a Flood Warning and Evacuation Plan, if required, would provide a practical means of managing the residual flood risk associated with the development.

RECOMMENDATION

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:

- Evidence that the drainage design has accounted for the existing surface water flow paths crossing the site, together with the associated flood volumes originating from upstream land. The permeable paving should be designed to accommodate both these existing runoff volumes and additional runoff generated by the proposed development, ensuring properties remain protected from flooding and that flood risk is not increased elsewhere.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.
- The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

- Given that permeable paving maintenance is intended to be the responsibility of the property owner, this should be included in the deeds to the property.
- The application states that foul drainage will discharge to a private treatment system. This requires consultation with the EA, see the [EA guidance](#). The applicant can also contact the EA for pre-planning advice at swx.sp@environment-agency.gov.uk.
- The EA's standing advice for minor extensions will apply.
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.

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 out 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.