

Technical Note 2: Response to FRA Holding Objection on Wiltshire Council Planning Application Number PL/2026/01683

Site: 32 Market Place, Warminster, BA12 9AN
Prepared by: Joe Hitchman
Approved by: Neil Jaques
Date: 22 September 2026

1.0 Introduction

1.1 This Technical Note (TN) has been prepared by Motion on behalf of Ellis and Partners in response to the Wiltshire Council (WC) holding objection on WC planning application number PL/2026/01683, dated 24th August 2026, in **Appendix A**.

1.2 Within the holding objection it is outlined that the LLFA require further information. The information requested is listed within the holding objection, and is repeated below:

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a detailed review of the drainage and flood risk aspects of the proposal:

- The applicant must provide details of the proposed flood resilience measures, including confirmation of finished floor levels in relation to the predicted 1 in 100-year flood level (including appropriate freeboard) for both existing and proposed development.*
- Evidence that the correct clearances have been adhered to. Based on CIRIA guidance the appropriate clearance depends on the density of the chalk - if its high density then it would be 5m, low density or undetermined it would be 10m. 5m is the minimum for any ground condition.*
- Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.*
- 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 demonstrating that safe access and egress during the design flood can be achieved. Guidance on the preparation of an emergency plan can be found here.*

2.0 Response

2.1 Our responses to the comments raised by the LLFA, are provided in the below table and attached Appendices.

Holding Objection Reason	Response
The applicant must provide details of the proposed flood resilience measures, including confirmation of finished floor levels in relation to the predicted 1 in 100-year flood level (including appropriate freeboard) for both existing and proposed development.	As referenced within the LLFA response dated 24th August 2026, the proposed new dwelling to the rear of 32 Market Place will be constructed with FFLs set 150mm above the maximum surface water flood level. As the dwelling is located outside of the flood risk zone, including the 2070s upper-end climate change allowance, the FFLs will be located 150mm above existing ground levels. The existing unit, proposed to be converted to residential, is however located within the 1 in 100-year pluvial flood risk zone, with depths estimated between 150-300m for both the baseline 1 in 100, and the 1 in 100 plus climate change events. Assuming a worst-case depth of 300mm, the FFLs of the converted unit will be set 450mm above existing external levels. Additional flood resistance measures should be employed such as installing airbrick covers and non-return valves on the drainage system. Resilience measures such as raising sockets and having tiled floors should also be pursued.
Evidence that the correct clearances have been adhered to. Based on CIRIA guidance the appropriate clearance depends on the density of the chalk - if its high density then it would be 5m, low density or undetermined it would be 10m. 5m is the minimum for any ground condition.	We agree that there is no space outside of 5m from either the existing or proposed building, and therefore there is no area to site a soakaway in compliance with Building Regulations Part H. Therefore, we propose to use the permeable paving subbase beneath the car park area as attenuation, before discharging to the existing retained drainage connection on site. The area of the permeable paving is constrained by the existing, proposed dwellings and site boundary. The depth is limited by the depth of the existing downstream connection, and therefore the subbase depth can only be 300mm deep. However, given the limited area draining to the surface water system, and the minimum practicable orifice diameter of 50mm, sufficient storage is present to limit discharge without increasing flood risk for the 1 in 100 year plus 45% climate change event. As the existing site is fully comprised of hardstanding the proposed approach represent betterment. It is also proposed to locate SuDS planters at downpipes in order to achieve some amenity and biodiversity benefit. The hydraulic modelling for the proposed drainage system is included within Appendix B, and the General Arrangement drawing within Appendix C of this report. Please note that FSR rainfall has been used within the modelling, as due to the small site area, there will be negligible change in modelling results should FEH rainfall be used.
Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.	As above, the revised sustainable drainage proposal no longer makes use of soakaways or infiltration, and therefore the risk of groundwater impacting the performance of the SuDS is removed. It should be noted that there is no risk of floatation to permeable paved systems, even if groundwater levels were to be at surface level.
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 demonstrating that safe access and egress during the design flood can be achieved. Guidance on the preparation of an emergency plan can be found here	We have produced a Flood Warning and Evacuation Plan in support of this Technical Note. With reference to the LLFAs comments in their response of 24th August 2026, we note that the hazard rating for the areas of access/egress when using a depth of 300mm results in a HR value of 0.725. This value still equates to “Very low hazard – caution”.

Appendix A

WC holding objection on WC planning application number PL/2026/01683

To:	Verity Giles-Franklin	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01683
Service Ref:	Drainage
Date:	24/08/2026

PROPOSAL

Full planning permission for conversion of rear part of existing ground floor commercial unit to form residential flat, retention of commercial unit to front portion of ground floor. Construction of single dwelling on hard standing area to rear of 2 Market place, including landscaping and amenities.

SITE LOCATION

32 Market Place, Warminster, BA12 9AN

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
- Decision Notice (PL/2022/05276)
- Flood Risk Assessment (PL/2022/05276)
- Location, Block and Site Plans (PL/2026/01683)
- Existing and Proposed Plans and Elevations (PL/2026/01683)
- Planning and Flood Risk Assessment (July 2026) (PL/2026/01683)
- Technical Note (July 2026) (PL/2026/01683)

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 applicant has reconsulted with revised drainage strategy documents; however, the updated submission does not address the conditions in the previous drainage response issued on 14/05/2026. The applicant must provide additional information to discharge all the condition.

It is noted that the applicant states that the proposed single dwelling to the rear of 32 Market Place will be constructed with FFLs set 150 mm above the maximum surface water flood level. The applicant advises that the dwelling is located outside the estimated extent of the 1% annual probability surface water flood event, including the 2070s upper-end climate change allowance for the 150-300 m flood depth scenario, and therefore considered FFLs set 150 mm above existing ground levels, together with hardstanding graded to direct runoff away from the property and towards the existing private lane.

However, no details have been provided regarding flood mitigation measures for the residential unit proposed at the rear through the conversion of part of the existing ground-floor commercial unit stating that the entry has 100 mm upstand. Whilst the FRA submitted under application PL/2022/05276 identifies potential interaction of surface flood water (150-300 mm depth) with the building and groundwater with the basement, no mitigation or resilience measures have been proposed by the applicant to address these risks. Although the FRA recommends retaining existing external levels to maintain overland flow routes away from the building, the proposal results in a change in vulnerability from a commercial use to a residential use. The applicant has not demonstrated how flood risk to the proposed residential unit will be managed. Appropriate flood mitigation measures should therefore be provided, or the finished floor level (FFL) should be raised to an appropriate level above the flood level.

The applicant has provided justification that as per Table 13.1 of FD2320/TR2 and Figure 3.2 of FD2321/TR1 the hazard rating for the proposed development access is very low. However, the depth considered is 0.15m, whereas the EA flood maps show the access to flood depths between 150-300mm due to surface water flooding for a 1 in 100-year rainfall events. If the applicant has undertaken detailed hydraulic modelling that provides a more robust assessment than the Environment Agency's surface water flood mapping, this should be submitted together with the resulting hazard ratings for review. The LLFA require the applicant to adopt the worst-case scenario for drainage design.

The EA's flood risk guidance requires developments to demonstrate safe access and egress and consider flood hazard to people and vehicles. Given flood depths of 300 mm are potentially hazardous to vehicles and may affect safe access and egress during flood events. The applicant should therefore provide an appropriate Emergency Plan, demonstrating how ingress and egress can safely be maintained during a flood event.

In the technical note it is recommended that the potential owner or occupier should adhere to the advice to ensure that the pump located within the basement remains fit for purpose and is maintained for the lifetime of the development given the risk due to ground water flooding. The applicant states that this will be included in the ownership and maintenance arrangements.

Given the risk of ground water flooding the LLFA recommends conducting a groundwater investigation capturing seasonal variation, rather than reliance on results from 1991 bore log data. The LLFA deems this important due to the drainage strategy relying on infiltration.

The updated submission does not satisfactorily address the requirements set out in the previous LLFA response. Therefore, the recommendations and conditions contained within the previous LLFA consultation response remain applicable.

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 detailed review of the drainage and flood risk aspects of the proposal:

- The applicant must provide details of the proposed flood resilience measures, including confirmation of finished floor levels in relation to the predicted 1 in 100-year flood level (including appropriate freeboard) for both existing and proposed development.
- Evidence that the correct clearances have been adhered to. Based on CIRIA guidance the appropriate clearance depends on the density of the chalk - if its high density then it would be 5m, low density or undetermined it would be 10m. 5m is the minimum for any ground condition.
- Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.
- 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 demonstrating that safe access and egress during the design flood can be achieved. Guidance on the preparation of an emergency plan can be found [here](#)

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

No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and National Technical Standards for SuDS.

In order to discharge the above drainage condition the following additional information must be provided

- A clearly labelled drainage layout plan showing existing and proposed drainage pipe networks and any SuDS as per the drainage strategy.
- The applicant must ensure there is 5m minimum clearance between the soakaway any road or built structure.
- 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.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- All new drainage will need to comply fully with Building Regulations Part H (and they should engage with the building control department in order to ensure this).
- 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.
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker.
- 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.

Appendix B

MicroDrainage Modelling

Motion

84 North Street

Guildford

Surrey GU1 4AU

Date 22/09/2026 14:45

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Source Control 2020.1.3

Summary of Results for 100 year Return Period (+45%)

Half Drain Time : 20 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	9.918	0.219	0.0	2.3	2.3	3.6	Flood Risk
30 min Summer	9.965	0.266	0.0	2.6	2.6	4.3	Flood Risk
60 min Summer	9.978	0.279	0.0	2.6	2.6	4.5	Flood Risk
120 min Summer	9.954	0.255	0.0	2.5	2.5	4.1	Flood Risk
180 min Summer	9.922	0.223	0.0	2.3	2.3	3.6	Flood Risk
240 min Summer	9.893	0.194	0.0	2.1	2.1	3.1	Flood Risk
360 min Summer	9.852	0.153	0.0	1.9	1.9	2.5	Flood Risk
480 min Summer	9.825	0.126	0.0	1.7	1.7	2.0	Flood Risk
600 min Summer	9.805	0.106	0.0	1.5	1.5	1.7	Flood Risk
720 min Summer	9.791	0.092	0.0	1.4	1.4	1.5	Flood Risk
960 min Summer	9.773	0.074	0.0	1.2	1.2	1.2	Flood Risk
1440 min Summer	9.759	0.060	0.0	0.9	0.9	1.0	Flood Risk
2160 min Summer	9.748	0.049	0.0	0.6	0.6	0.8	Flood Risk
2880 min Summer	9.742	0.043	0.0	0.5	0.5	0.7	Flood Risk
4320 min Summer	9.734	0.035	0.0	0.4	0.4	0.6	Flood Risk
5760 min Summer	9.729	0.030	0.0	0.3	0.3	0.5	Flood Risk
7200 min Summer	9.726	0.027	0.0	0.3	0.3	0.4	Flood Risk
8640 min Summer	9.725	0.026	0.0	0.2	0.2	0.4	Flood Risk
10080 min Summer	9.724	0.025	0.0	0.2	0.2	0.4	Flood Risk
15 min Winter	9.917	0.218	0.0	2.3	2.3	3.5	Flood Risk
30 min Winter	9.961	0.262	0.0	2.5	2.5	4.2	Flood Risk
60 min Winter	9.965	0.266	0.0	2.6	2.6	4.3	Flood Risk
120 min Winter	9.923	0.224	0.0	2.3	2.3	3.6	Flood Risk
180 min Winter	9.881	0.182	0.0	2.1	2.1	3.0	Flood Risk
240 min Winter	9.849	0.150	0.0	1.8	1.8	2.4	Flood Risk
360 min Winter	9.807	0.108	0.0	1.5	1.5	1.8	Flood Risk

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Time-Peak (mins)
15 min Summer	136.560	0.0	5.1	20
30 min Summer	91.729	0.0	6.9	29
60 min Summer	58.739	0.0	8.8	46
120 min Summer	36.254	0.0	10.9	78
180 min Summer	26.900	0.0	12.1	110
240 min Summer	21.623	0.0	13.0	140
360 min Summer	15.914	0.0	14.3	202
480 min Summer	12.782	0.0	15.3	262
600 min Summer	10.774	0.0	16.2	320
720 min Summer	9.365	0.0	16.8	380
960 min Summer	7.499	0.0	18.0	498
1440 min Summer	5.473	0.0	19.7	738
2160 min Summer	3.985	0.0	21.5	1100
2880 min Summer	3.178	0.0	22.9	1464
4320 min Summer	2.306	0.0	24.9	2204
5760 min Summer	1.834	0.0	26.4	2936
7200 min Summer	1.536	0.0	27.6	3672
8640 min Summer	1.330	0.0	28.7	4336
10080 min Summer	1.178	0.0	29.7	5040
15 min Winter	136.560	0.0	5.1	21
30 min Winter	91.729	0.0	6.9	30
60 min Winter	58.739	0.0	8.8	48
120 min Winter	36.254	0.0	10.9	82
180 min Winter	26.900	0.0	12.1	114
240 min Winter	21.623	0.0	13.0	144
360 min Winter	15.914	0.0	14.3	204

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Rainfall Details

Rainfall Model	FSR	Ratio R	0.350	Cv (Winter)	1.000
Return Period (years)	100	Summer Storms	Yes	Shortest Storm (mins)	15
Region	England and Wales	Winter Storms	Yes	Longest Storm (mins)	10080
M5-60 (mm)	20.000	Cv (Summer)	1.000	Climate Change %	+45

Time Area Diagram

Total Area (ha) 0.015

Time (mins)	Area (ha)	Time (mins)	Area (ha)	Time (mins)	Area (ha)
From:	To:	From:	To:	From:	To:
0	4	4	8	8	12
	0.005		0.005		0.005

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Model Details

Storage is Online Cover Level (m) 10.000

Cellular Storage Structure

Invert Level (m) 9.699 Safety Factor 2.0
 Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.30
 Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)
0.000	54.0	0.0	0.300	54.0	0.0	0.301	0.0	0.0

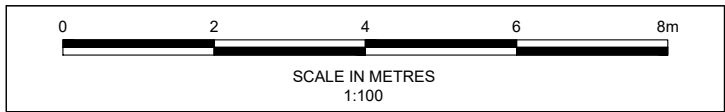
Orifice Outflow Control

Diameter (m) 0.050 Discharge Coefficient 0.600 Invert Level (m) 9.699

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Appendix C

Surface Water Drainage Layout Plan



- Notes
1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
 2. This drawing is based on OS mapping and Motion cannot guarantee the accuracy of the data.

- Legend
- Proposed Contributing Area = 143.8m²
 - Existing Foul Water Gravity Pipe
 - Proposed Foul Water Gravity Pipe
 - Proposed Surface Water Gravity Pipe
 - Existing Foul Water Inspection Chamber
 - Existing Foul Water Manhole
 - Proposed Foul Water Manhole
 - Proposed Orifice Flow Control
 - Proposed Permeable Paving

P01	First Issue	LL	JH	NJ	23/09/2026
Rev.	Description	Drm	Chk	App	Date

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION



Client:

Ellis and Partners Limited

Project:

32 Market Place, Warminster

Title:

Drainage Strategy

Scale: 1:100 (@ A1)

Drawing:

2601070-0501

Revision:

P01

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