

To:	Adam Madge	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/05572
Service Ref:	Drainage
Date:	13/10/2026

PROPOSAL

Outline planning permission: Some matters reserved

Outline planning application with all matters reserved except for access for a policing hub, storage building, vehicle washdown building, fuel store, external storage, parking (operational, staff, public and accessible), cycle parking and associated site access from Mitre Way.

SITE LOCATION

Land at Mitre Way, Old Sarum, Salisbury, SP4 6GW

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
- Design and Access Statement
- Existing Site Block Plan
- Flood Risk Assessment and Drainage Strategy
- Geo-Environmental Desk Top Study
- Ground Condition Assessment
- Illustrative Site Plan
- Planning Statement
- Site Location Plan
- Surface Water Drainage Plans

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 LLFA's assessment relates to flood risk, water quantity, water quality and maintenance considerations. The proposed SuDS may also have implications for biodiversity, amenity, landscape, green infrastructure and placemaking objectives. Assessment of these matters falls outside the remit of the LLFA. The Local Planning Authority should seek and have regard to the advice of Wiltshire Council's Ecology, Landscape, urban design and other relevant specialist teams when considering these aspects of the proposal.

The applicant confirms that, given the outline nature of the application, the proposed drainage strategy is indicative at this stage. Detailed hydraulic modelling and a finalised drainage design will be prepared and submitted at the Reserved Matters stage to demonstrate full compliance with drainage requirements.

Surface water runoff from roads, parking areas, service yards, and roofs will be collected via conventional drainage systems and managed through two separate surface water networks. Excess roof runoff, following rainwater harvesting, will discharge to the drainage network. Runoff from access roads and service yards will receive treatment before discharging to a bioretention basin for attenuation and infiltration, while runoff from the car park will be treated and conveyed to an underground cellular infiltration system for attenuation and infiltration to ground.

Given that all surface water runoff is proposed to be managed through infiltration, it is considered likely that the interception storage requirement will be achieved. Nevertheless, the applicant should provide supporting interception storage calculations to formally demonstrate compliance with the relevant SuDS water quality requirements.

BRE365 infiltration testing undertaken in February 2025 identified infiltration rates ranging from 1.61×10^{-5} m/s to 2.49×10^{-4} m/s, with no groundwater encountered and groundwater levels anticipated to be greater than 5.0 m below ground level and recommended that traditional soakaways were likely to be feasible on site.

The applicant should justify the infiltration rates adopted within the BRE365 design calculations (8.8×10^{-5} m/s for the bioretention basin and 1.5×10^{-4} m/s for the geocellular infiltration system), including confirmation of the relevant test locations and evidence that the selected values are representative of the proposed drainage features.

It is noted that the submitted Geo-Environmental Desk Study identifies the presence of soluble rock within the area; however, the risk of natural ground subsidence is assessed as very low.

On this basis, no further ground stability testing is considered necessary in support of this application.

The site is located within Source Protection Zone 1 (SPZ1) and the proposed infiltration features appear to receive runoff from trafficked surfaces, including parking and service yard areas. The applicant should provide a comprehensive Simple Index Approach assessment demonstrating the treatment of total suspended solids (TSS), hydrocarbons and metals, and confirm that the proposed SuDS train delivers the required water quality treatment levels. While treatment measures including a Class 1 oil interceptor, vortex separator, and bioretention basin have been incorporated into the drainage strategy, the applicant should demonstrate compliance with [Environment Agency's approach to groundwater protection](#) and provide a hydrogeological risk assessment, or confirmation from the Environment Agency that one is not required, to demonstrate that the proposed infiltration SuDS will not pose an unacceptable risk to the underlying groundwater resource.

Whilst the proposed strategy includes a bioretention basin, consideration should be given to incorporating additional source-control SuDS measures, such as planters, rain gardens, swales or permeable paving, where feasible, to better align with the SuDS hierarchy and further enhance water quality, biodiversity and amenity benefits.

RECOMMENDATION

We understand that this application is for access road only and for that we do not have comments.

For other reserved matters related to surface water and flood risk management our comments are as follows:

No objection subject to the following conditions

- 1. 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.**

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

- The applicant shall provide justification of the infiltration rates adopted within the drainage design.
- The surface water drainage strategy should demonstrate 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 year plus climate change rainfall event does not cause flooding to any building (including a basement).
 - 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.
- The drainage drawings should show the pipe / link & manhole / node numbers used in the calculations in order to link the drawing with the detailed calculations. The drainage drawings should also be based on topographical survey and include details of site levels and proposed network levels, to demonstrate that on-site levels can accommodate the proposed drainage arrangement and achieve satisfactory conveyance of surface water.
- Detailed hydraulic modelling results confirming performance and sizing for proposed drainage components.
- Evidence shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS. Calculations that demonstrate compliance with these interception requirements should be provided.
- Cross section and standard detail drawings should be provided for the attenuation, conveyance and infiltration features and their components.
- The applicant shall submit a manhole / inspection chamber schedule to include cover and invert levels.
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- The applicant should provide a comprehensive Simple Index Approach assessment for TSS, hydrocarbons and metals, demonstrating that the proposed SuDS train achieves the required water quality treatment.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.

- The drainage strategy should ensure compliance with the [Environment Agency's approach to groundwater protection](#), which states that where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

As-Built SuDS and Watercourse/Ditch Modification Drawings (AutoCAD Format)

No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer shall submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:

1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
2. As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
 - AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
 - PDF format for record purposes.
4. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.
5. An updated SuDS Maintenance Plan reflecting the final as-built arrangement.

The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system.

Reason:

To ensure the constructed drainage system and watercourse/ditch modifications accord with the approved design, to maintain accurate LLFA drainage records, and to ensure the development does not increase flood risk on- or off-site, in accordance with the NPPF and Wiltshire Council SuDS guidance.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the [Wiltshire Guidance](#).

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.