

To:	Jemma Foster	From:	Drainage (Barney Taylor)
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Planning App Ref:	PL/2025/09486
Service Ref:	Drainage
Date:	19/01/2026

PROPOSAL

Reserved Matters Application for a) The scale of the development; b) The layout of the development; c) The access road and the 'foot-cycleway' connecting the housing with the A361: including kerbing, any cutting/embankment/retaining structures, camber, surfacing, drainage and the stream crossing; d) The external appearance of the development; e) The landscaping of the site.

SITE LOCATION

Land South of Trowbridge

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
- Construction Environmental Management Plan
- Covering Letter
- Drainage Exceedance Plan – Sheet 1, 2 & 3
- Drainage Strategy – Sheet 1, 2 & 3
- Drainage Technical Note
- FFLs for Planning – Sheet 1 & 2
- Illustrative Lap Layout
- Impermeable Areas – Sheet 1, 2 & 3
- Location Plan
- Planning Layout – Sheet 1, 2 & 3
- Topographical Survey

20/00379/OUT

- Flood Risk Assessment Part 1 & 2
- Groundwater Flood Risk Assessment
- Preliminary Ground Investigation

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.

It is noted that there have been several queries regarding the proposed development, including from Graham Hill as flood warden. The LLFA will not replicate these comments, but would direct the applicant to review public concerns uploaded onto the portal & Mr Hill's correspondence.

The LLFA are proposing an objection to ensure the applicant demonstrates there will be no increased flood risk to people & property. The LLFA will only remove the objection if the applicant has demonstrated compliance with several local and national policies referenced in the Informatives section of the response, and provides the additional information requested.

Drainage Technical Note – Flood Alleviation Strategy:

- Teignconsult Drawing FRA22 showed three flood alleviation (cut off) ditches to the north-east of the site with a total capacity for 348l/s. These were initially to be discharged to a piped system under the roads and eventually to the attenuation ponds to the south of the site. The applicant now proposes swales to run along the site's northern development edge and discharge directly into the stream, mimicking the existing situation (see Drainage Strategy, Appendix A).
- The flood alleviation strategy also includes flood compensation works around the road over the stream. Road levels and flood compensation contours in this area are as per the approved Teignconsult consult drawing FRA10 from July 2022. The RM Drawing is attached to Appendix B.

Proposed Drainage Strategy – clarifying revisions since Outline application: 20/00379/OUT:

The proposed Drainage Strategy is stated to be as per the approved Outline drawings, with a slight deviation in discharge rates to comply with new Wiltshire Council Drainage and Betterment Strategy (June 2024) and with a new attenuation pond to the north-west of the site to drain the access road, which was not considered at outline Stage.

Surface Water Drainage Strategy:

Table 2 of the Drainage Technical Note:

Storage feature	Greenfield rate 1 in 1 year event	Greenfield rate 1 in 100 year event	Discharge rate 1 in 1 year event	Discharge rate 1 in 100 year event	Betterment provided 1 in 1 year event	Betterment provided 1 in 100 year event
Highways Attenuation Pond 1	0.3 l/s	1.1 l/s	0.5 l/s	0.5 l/s	-66%	54%
Highways Attenuation Pond 2	0.6 l/s	2 l/s	0.5 l/s	0.5 l/s	18%	75%
Attenuation Ponds 3-5	13.2 l/s	41 l/s	5.4 l/s	7 l/s	59%	73%
Total	14.1 l/s	44.1 l/s	6.4 l/s	8 l/s	55%	81%

Observing Table 2 within the Drainage Technical Note submitted, the discharge from Attenuation Pond 1 during the 1 in 1 year event does not provide betterment.

It is noted the site-wide net-betterment targets are met. If there is no catchment transfer of surface water flows, the LLFA agree further flow rate restriction is not feasible, and consequently would agree to this discharge rate. Once the catchment plans are provided, the LLFA can provide further comment.

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:

Existing Flood Risk:

- The applicant must provide the proposed drainage strategy drawings overlaid with filled transparent hatching of flood zones, and a separate drawing overlaying the modelled surface water flooding for the 1 in 30 and 1 in 100 year event with filled transparent hatching. It is noted the applicant has drawn lines indicating flood zones, however this is not overly clear, and is difficult to interpret in relation to the proposed drainage strategy. It is important the applicant represents pluvial and fluvial flood risk separately.

This is required to increase the visibility of the drainage strategies interaction with modelled flood risk & flooding. The revised drawings should enable the applicant to demonstrate the flood mitigation proposed, and how the impact of flood risk to people & property will be safely managed.

Overland Exceedance Flows: (National Standards for SuDS: Standard 3: management of extreme rainfall and flooding):

- It is noted the applicant has provided drainage exceedance plans, however further detail is required. Currently, exceedance flow arrows are provided along the highway and plots, however the applicant must demonstrate where flow will be directed across the extent of the site (e.g. green box).

This is required to demonstrate the applicant has considered how overland exceedance flows may impact adjacent people & property, and mitigated any flood risk.

- The applicant must also outline how exceedance in rear properties will be safely managed and safely disposed of across the site (e.g. orange boxes).



Surface Water Catchments: (National Standards for SuDS: Standard 3: management of extreme rainfall and flooding):

- The applicant must provide a pre-development surface water catchment plan, and a post-development catchment plan. Each plan should include the whole site, not only the developed area.

The applicant is required to demonstrate there is no catchment transfer that could increase flood risk elsewhere / downstream as a result of the development.

Surface Water Disposal Hierarchy (National Standards for SuDS: Standard 1: runoff destinations) & Standard 2: management of everyday rainfall (interception):

- It is noted in the FRA Part 2, submitted within 20/00379/OUT, infiltration testing demonstrated there is some capacity to infiltrate surface water.

While it is appreciated that not all the surface water runoff from the site may be able to discharge via infiltration, the applicant is expected to provide a drainage strategy that partially infiltrates in adherence to the surface water drainage hierarchy (paragraph 1.2 of Standard 1: runoff destinations).

- The applicant must demonstrate that the first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems (paragraph 2.7 of National Standards for SuDS: Standard 2: management of everyday rainfall (interception)).

Once all points above have been resolved, the applicant can provide the following information related to the surface water drainage strategy via condition:

- Observing page 4 of the Drainage Technical Note, the inlet level of Attenuation Pond is stated as 38.65, however on the drainage strategy drawings, this is 39.65. Can the applicant confirm which is correct, and amend any incorrect document.
- Additionally, there is surcharging & flood risk present within the in the 1 in 1 year event. The applicant must ensure there is no surcharging or flood risk at any node, aside from just prior to the flow control device.
- The access to the site is proposed across the main river. While it is noted a bridge is proposed across the river, the applicant must provide a flood evacuation plan to demonstrate how safe access and egress can be maintained during a flood event.
- It is noted the swale in the north is not connected to the surface water network, but will intercept flows from the northern catchment. The applicant must confirm whether the discharge rate will be restricted to mitigate increasing flood risk downstream of the river. Additionally the applicant must outline how sufficient water quality treatment will occur prior to discharging flow into the main river – this is required to demonstrate pollution risk to groundwater & watercourses is sufficiently mitigated.
- The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with the National Standards for SuDS (Standard 4: water quality).
- The applicant must provide detailed cross and long section drawings, and standard detail drawings any attenuation, conveyance or infiltration features and their components (e.g. each attenuation pond & swale). The applicant must also provide details of the lining and freeboard proposed for each separate feature.

- The applicant must provide a construction management plan that clearly demonstrates how flood risk to people & property, and pollution to watercourses & groundwater will be prevented throughout construction.

The applicant should provide additional detail regarding how sediment accumulation will be prevented, and how de-watering is proposed without increasing flood or pollution risk.

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.

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](#).

- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, the discharge rate from the site must be agreed with Wiltshire Council as part of agreeing the surface water drainage strategy for the site.

- The application states that foul drainage will discharge to a public sewer. This requires consultation with the sewerage undertaker for the area.
- If a value other than 0m³/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate

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.