

To:	Jemma Foster	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01153
Service Ref:	Drainage
Date:	19/03/2026

PROPOSAL

Discharge of conditions 7 (Lighting), 9 (SUDS), 10 (CEMP), 12 (LEMP), 13 (Contamination) and 16 (Archaeology) relating to application 20/00379/OUT following Appeal Ref: 3321957.

SITE LOCATION

Land at Southwick Court Farm, South of Trowbridge

APPLICATION DOCUMENTS REVIEWED

- Application Form
- 20-00379-OUT - Appeal Decision Notice
- 20-00379-OUT Drainage response (09/11/2022)
- 20-00379-OUT - Site Location
- Condition 9 - Drainage Exceedance Plan - Sheet 1,2 & 3
- Condition 9 - Drainage Strategy for Planning - Sheet 1,2 & 3
- Condition 9 - Drainage Strategy for Planning - Sheet 1,2 & 3
- Condition 9 - Drainage Technical Note

ASSESSMENT OF THE PROPOSAL

Context

In 2022 The LLFA had the following conditions for which information was required before these could be discharged. The applicant has now submitted an application for the Approval of Details Reserved by Condition, referring to the appeal decision issued on 20 March 2024.

- 1. Condition 9: No development shall commence on site until a scheme for the discharge of surface water from the site has been submitted to and agreed in writing by the Local Planning Authority. This should address the matters raised in the Council's letter, as Lead Local Flood Authority dated 9th November 2022.**

Assessment

The applicant has submitted a Drainage Exceedance Plan, Drainage Strategy for Plan, and a Drainage Technical Note in support of the application to discharge Condition 9, as required by the appeal decision notice. Condition 9 requires the applicant to provide the information referenced in the LLFA correspondence dated 9 November 2022.

The submitted drainage strategy proposes discharging surface water flows to Lambrok Stream, restricted in line with Wiltshire Council's betterment policy. Swales are proposed along the northern development edge to intercept existing surface-water flow routes and discharge directly to the stream, several issues prevent full assessment of the proposed drainage arrangements. There are discrepancies between the MicroDrainage model and the corresponding details on the drainage layout drawings, including inconsistencies in pipe lengths, gradients, manhole invert levels, and missing details relating to the attenuation tank. Several network elements are also not clearly labelled or annotated. These inconsistencies prevent the LLFA from verifying the accuracy and completeness of the proposed drainage network, and the applicant is therefore required to review and amend the drainage layout drawings to ensure consistency across submitted documents.

The submitted drainage strategy addresses aspects of the requirement for a Detailed Surface Water Drainage Design as referenced in the LLFA letter dated 9 November 2022; however, it does not fully satisfy all elements of the condition. No information has been provided to demonstrate how the proposed SuDS features will be designed to prevent groundwater ingress. In addition, no evidence has been submitted to show that the proposed drainage system provides an adequate level of water quality treatment prior to discharge, as required to protect the receiving watercourse. Furthermore, details relating to the Construction Phase Management Plan have not been provided.

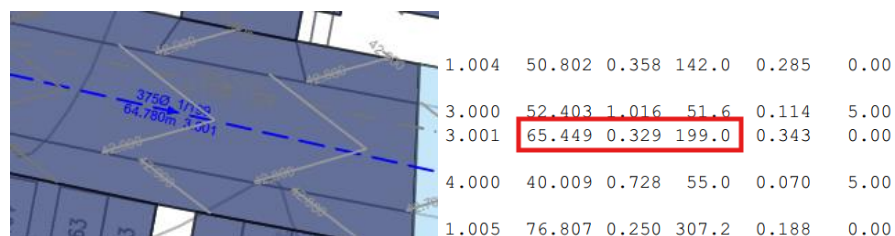
Although a Drainage Exceedance Plan has been submitted, further detail is required. The plan currently shows exceedance flow arrows along the highway and within individual plots but does not demonstrate how overland flows will be routed across the wider site. The applicant must show full exceedance pathways to evidence that potential impacts on adjacent people and property have been assessed and mitigated. In addition, no information has been provided on how exceedance flows from the rear of properties will be safely managed and directed to an appropriate location.

Previous points C4 – Detailed Surface Water Drainage Design and C6 – Ownership and maintenance have now been provided.

RECOMMENDATION

Condition 9 cannot be discharged at this stage because all the details requested by the LLFA in their consultation letter has not yet been submitted. The applicant must still provide the following information:

- **Groundwater**
 - Noting the groundwater FRA (April 2021) has been provided, the applicant must provide details of how the proposed SuDS features will be designed to prevent groundwater ingress from the high groundwater tables observed.
- **Water Quality**
 - It is noted that proposed attenuation ponds will likely provide a water quality benefit to surface water runoff. The applicant must submit calculations to demonstrate that the proposed drainage design provides a sufficient level of water quality treatment to prevent pollution of the receiving watercourse.
- **Detailed Surface Water Drainage Design**
 - The drainage proposals currently provide limited numbers of SuDS features. The design does not currently consider the use of source-control devices, (such as raingardens, bioretention areas, green roofs), or green-blue infrastructure corridors (including ditches, swales) which could provide multi-faceted benefits of managing water quantity and quality as well as promoting amenity and biodiversity throughout the development. In order to improve the character and quality of the area and the development's climate change resilience the applicant is required to incorporate additional SuDS features across the development which provide benefits to water quantity, quality, amenity and biodiversity benefit
 - The applicant must submit revised drainage layout drawings and calculation documents ensuring consistency.



Inconsistent Information Between Drawing and Model Output



Missing details relating to the attenuation tank

- **Overland Exceedance Routing**

- 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).



- **Construction Phase Management Plan**

- The applicant is required to submit a construction phase management plan to demonstrate how surface water quantity and quality will be managed throughout construction in order to prevent an increase in flood risk and / or contamination of the receiving watercourses, and adjacent nature reserve.

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.