

To:	Alex Jelley	From:	Drainage (Rahul Dixit)
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Planning App Ref:	PL/2026/02483
Service Ref:	Drainage
Date:	11/05/2026

PROPOSAL

Discharge of conditions 8 (Landscaping), 11 (Tree Protection Plan), 21 (LEMP), **22 (Surface Water Discharge)**, 23 (Foul Discharge), 29 (Ecological Enhancement Measures) and 34 (EV Charging Plan) and partial discharge of condition 25 (External Lighting) of 15/04736/OUT

SITE LOCATION

Land southeast of Trowbridge

APPLICATION DOCUMENTS REVIEWED

- 15-04736-OUT Decision Notice
- 15-04736-OUT Location Plan
- Application Form
- Flood Exceedance Flows
- General Arrangement and Drainage Strategy
- Impermeable Areas
- National Standards for SuDS Drainage Note
- Covering Letter
- Statutory Consultation Response: Drainage (15-04736-OUT); dated 12/04/2024.
- Chapter 11: Hydrology, Drainage, and Flood Risk

Also considered:

- Statutory Consultation Response: Drainage (PL/2025/07352); dated 27/10/2025.
- Statutory Consultation Response: Drainage (PL/2025/07352); dated 05/03/2026.
- Statutory Consultation Response: Drainage (PL/2025/07352); dated 20/03/2026.
- Detailed Engineering Sheet (PL/2025/07352) (Dwg. No. 629-PH1-P-150- [01-03] Rev. F)
- Drainage Simulation Results (PL/2025/07352) (22/08/2025)
- Attenuation Ponds B and E2 (PL/2025/07678) (Dwg. 566-ID-P-320-01 Rev. E)
- Detailed Engineering Sheet 2 (PL/2025/07678) (566-ID-P-150-02 Rev.C)

ASSESSMENT OF THE PROPOSAL

Context

The drainage team have no comments to make on conditions: 8 (Landscaping), 11 (Tree Protection Plan), 21 (LEMP), 23 (Foul Discharge), 29 (Ecological Enhancement Measures) and 34 (EV Charging Plan) and partial discharge of condition 25 (External Lighting).

On **12 April 2024**, the Lead Local Flood Authority (LLFA) provided several drainage-related conditions in response to the detailed drainage strategy submitted in support of the outline planning application (ref. **15/04736/OUT**). The outline planning application was subsequently approved, subject to conditions, as per **decision date: 2 September 2025**.

Following the grant of outline consent, the applicant submitted a **Reserved Matters application** (ref. **PL/2025/07352**, **Dated: 09/09/2025**) for a specific phase of the development. This application relates to **Ashton Park – Phase 1 (Residential), Land Parcel 3**, which forms part of the wider development approved under the outline planning permission.

LLFA Consultation History for PL/2025/07352:

On **10 October 2025** the LLFA reviewed the Reserved Matters submission and identified a number of deficiencies. The LLFA set out a series of actions for the applicant to address, noting that the submitted information failed to adequately demonstrate compliance with the National Standards for Sustainable Drainage Systems (2025).

Following a review of the revised submission, the LLFA issued further comments on **5 March 2026**, requesting additional information relating specifically to Standards 1, 2, and 3 of the National Standards for Sustainable Drainage Systems (2025), in order to complete its assessment of the proposed drainage strategy and flood risk aspects of the development.

Upon subsequent review of the information provided, the LLFA responded again on **20 March 2026**, reiterating the need for the same details to address outstanding gaps within the submitted information.

The Reserved Matters application was later approved, subject to conditions relating to drainage and flood risk, with a decision date of **17 April 2026**. In order to discharge these conditions, the applicant submitted a **Discharge of Conditions application** (ref. **PL/2026/02534**, dated **17/04/2026**), which is currently being considered as part of a separate, parallel consultation process..

In 2025 The LLFA had the following conditions for which information was required before these could be discharged:

22. No development in any particular Phase or sub Phase of the development or associated with the Yarnbrook and West Ashton Relief Road in isolation shall commence on site until a scheme for the discharge of surface water from the Phase or sub Phase or from the Relief Road in isolation, incorporating sustainable drainage details, and any related programme for delivery, has been submitted to and approved in writing by the Local Planning Authority. The development within the Phase shall not be first occupied and/or the Relief Road shall not be first used by non-construction traffic until surface water drainage has been constructed in accordance with the approved scheme(s) and related programme(s).

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in any phase in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

ASSESSMENT

Following the approval of the Reserved Matters application (ref. PL/2025/07352), The applicant has submitted drawings for General Arrangement and Drainage Strategy plan, exceedance flow detail, impermeable area details and a Drainage Note - National Standards for SuDS to discharge the conditions associated with the Outline application 15/04736/OUT.

Based on the information submitted by the applicant, the proposed drainage strategy for Ashton Park – Phase 1 (Residential), Land Parcel 3 comprises a piped drainage network in conjunction with permeable paving and rain gardens. Surface water runoff is proposed to be conveyed to an attenuation basin, from which flows would discharge at a restricted rate of 16.26 litres per second.

However, the applicant has stated that it is not feasible to deliver Priority 1 rainwater harvesting and reuse in accordance with Standard 1, nor to fully achieve the management of the first 5mm of rainfall as required under Standard 2. It is stated that compliance with these requirements would necessitate significant redesign of the approved site layout and drainage strategy.

The applicant further contends that, as these requirements were not mandatory at the time of the Outline planning determination, they were not embedded within the approved plans or the accompanying Design and Access Statement

The recommendation is only to discharge the outline application conditions for Ashton Park – Phase 1 (Residential), Land Parcel 3 and not the complete wider development approved under the outline consent.

RECOMMENDATION

Following a review of the information provided, Condition 22 cannot be discharged until the following information is submitted and accepted by the LLFA:

- Noting that there currently is not sufficient interception storage provided, we request that the applicant provides additional slow drain water butts ¹ on properties to help further reduce the shortfall. We would request that the applicant commits to this relatively low-cost intervention to aid in greater compliance with the National Standards.
- To demonstrate full compliance with National Standard 3, we request that the applicant provides a tabulated comparison of pre-development greenfield rates and proposed post-development discharge rates as per Wiltshire council's betterment policy to support Section 5.9 of the Drainage Note. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).

¹ [how-to-make-a-slow-drain-water-butt.pdf](#)

INFORMATIVES

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 sets 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.