

**Project:** Southview Farmhouse, Trowbridge

**Subject:** Response to LLFA Comments

**Reference:** 19682-TUM-TN-XXX-0001

| Date                      | Details     | Rev | Author | Checked by |
|---------------------------|-------------|-----|--------|------------|
| 8 <sup>th</sup> June 2026 | First issue | A   | BF     | RP         |

## 1 INTRODUCTION

Tumu Consulting Ltd has been appointed by Coulston Estates Ltd to provide a response to the Wiltshire Council Lead Local Flood Authority (LLFA) comments dated 17/04/2026 in relation to Planning Application Ref. PL/2026/01506 for the proposed development at Southview Farmhouse, Trowbridge.

The Wiltshire LLFA detailed comments are included in Appendix A. The LLFA has stated that:

*At this stage, further information is required to demonstrate the proposed drainage strategy is feasible, and that there will be no future detrimental impact on downstream development:*

- 1. We note the applicant has stated in section 3.1 of the Drainage Strategy Statement that Redrow Housing have agreed to accept flows discharged at 3.8l/s. The applicant must provide a statement that demonstrates this agreement with Redrow Housing and acknowledges that any future drainage design and planning application on the Redrow Houses site will include a 3.8l/s discharge.*
- 2. Post-development exceedance routing plans indicate that surface water exceedance flows are directed towards the future proposed development by Redrow Housing and the existing railway corridor. The applicant is required to submit further details demonstrating how exceedance flows will be safely managed in the pink areas, demonstrating how exceedance will not increase flood risk to the future Redrow Housing development and the existing railway infrastructure. The LLFA would expect the applicant to manage flows onsite, without directing flows towards existing or proposed development.*
- 3. Currently it is unclear when the Redrow Housing drainage strategy will be operational and available to accept the 3.8l/s discharge. The applicant must provide a clear timeline for completion of the proposed drainage strategy development by Redrow Housing. The applicant must demonstrate that the proposed development will not commence, or will not progress beyond agreed stages, until the Redrow Housing drainage network is in place and operational, or an alternative interim drainage solution has been approved in writing by the Local Planning Authority.*

## 2 Tumu Responses to the LLFA Comments

Responses to the three points raised by the Wiltshire LLFA are provided in Table 1 below. It is Tumu Consulting Ltd's understanding that these responses adequately address the matters raised by the LLFA.

| Wiltshire LLFA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Tumu Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. We note the applicant has stated in section 3.1 of the Drainage Strategy Statement that Redrow Housing have agreed to accept flows discharged at 3.8l/s. The applicant must provide a statement that demonstrates this agreement with Redrow Housing and acknowledges that any future drainage design and planning application on the Redrow Houses site will include a 3.8l/s discharge.</p>                                                                                                                                                                                                                   | <p>A letter from Barratt Redrow is included in Appendix B of this Technical Note. The letter confirms that:</p> <ul style="list-style-type: none"> <li>• foul and surface water drainage spurs will be provided to serve the Southview Farm development at agreed connection locations; and</li> <li>• the Barratt Redrow surface water drainage strategy has been designed to accommodate an additional discharge of 3.8 l/s from Southview Farm.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>2. Post-development exceedance routing plans indicate that surface water exceedance flows are directed towards the future proposed development by Redrow Housing and the existing railway corridor. The applicant is required to submit further details demonstrating how exceedance flows will be safely managed in the pink areas, demonstrating how exceedance will not increase flood risk to the future Redrow Housing development and the existing railway infrastructure. The LLFA would expect the applicant to manage flows onsite, without directing flows towards existing or proposed development.</p> | <p>An extract from the Wiltshire LLFA comments dated 17/04/2026 has been reproduced below. The areas highlighted in pink have been labelled Area 1 and Area 2 for ease of reference.</p>  <p>Area 1 comprises an existing soft-landscaped area that will be enhanced through the planting of additional trees. No alterations to existing ground levels are proposed within Area 1; therefore, existing surface water flow routes will remain unchanged and continue to be governed by the site's existing topography. Surface water runoff from Area 1 will continue to leave the site at greenfield runoff rates. As these flows reflect existing greenfield conditions, there will be no increase in flood risk to either the railway infrastructure or the proposed Barratt Redrow development.</p> <p>Area 2 lies outside the application site boundary and falls within the Barratt Redrow development site. As this area is outside our client's control and is proposed to be redeveloped as part of the Barratt Redrow scheme, responsibility for the management of surface water runoff within Area 2 rests with Barratt Redrow.</p> |

| Wiltshire LLFA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Tumu Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>3. Currently it is unclear when the Redrow Housing drainage strategy will be operational and available to accept the 3.8l/s discharge. The applicant must provide a clear timeline for completion of the proposed drainage strategy development by Redrow Housing. The applicant must demonstrate that the proposed development will not commence, or will not progress beyond agreed stages, until the Redrow Housing drainage network is in place and operational, or an alternative interim drainage solution has been approved in writing by the Local Planning Authority.</p> | <p>The letter from Barratt Redrow included in Appendix B details the temporary drainage arrangements that will be available should the Southview Farm development be delivered in advance of the Barratt Redrow drainage infrastructure. The letter states:</p> <p><i>"Should the Southview Farm development be constructed ahead of our development, foul water from the site will temporarily connect to the existing foul water sewer currently serving Southview Farm, generally in accordance with drawing 19682-TUM-SK-XXX-0001 Temporary Drainage. We confirm that the existing sewer will not be removed until a replacement connection for Southview Farm has been provided. Until our permanent drainage design is implemented, attenuated surface water runoff from Southview Farm will discharge via a combination of temporary ditch conveyance and overland flow routes to the culvert crossing beneath the railway line within our site, as shown on the above-referenced drawing."</i></p> <p>Drawing No. 19682-TUM-SK-XXX-0001 Temporary Drainage is included in Appendix B of this Technical Note.</p> |

**Table 1 Tumu Responses to the LLFA Comments**

**Appendix A – LLFA Comments**

|            |              |              |             |
|------------|--------------|--------------|-------------|
| <b>To:</b> | Jemma Foster | <b>From:</b> | Rahul Dixit |
|------------|--------------|--------------|-------------|

|                          |               |
|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2026/01506 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 17/04/2026    |

## PROPOSAL

Full planning application for demolition of redundant stone barns; erection of children's nursery with new access, car parking, secure garden and associated landscape and drainage works (Class E); installation of new vehicular access and parking area to retained Southview Farmhouse, erection of replacement rear conservatory, erection of car park, associated erection of boundary treatment, and associated drainage and landscaping.

## SITE LOCATION

Southview Farm, Drynham Road, Trowbridge, BA14 0PJ

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required | <b>X</b> |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              |          |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- Application form
- Location plan
- Demolition plan
- Existing barn drawings
- Planning statement
- Drainage documentation and strategy statement
- Existing site plan
- Existing garage and farmhouse drawings
- Proposed site plan and site access
- Proposed farmhouse and nursery
- Design and access statement

## 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 SFRA identifies the site as being within Flood Zone 1 with a low risk of fluvial, pluvial and groundwater flooding.

The access roads and car parking areas serving both the farmhouse and the nursery will be constructed using permeable surfacing with a sub-base designed to provide surface water attenuation. Where feasible, rainwater downpipes from both buildings will discharge to the permeable paving or directly into the sub-base. Areas of the nursery roof that cannot drain to the permeable system will instead discharge to a hydro-brake chamber located on the eastern side of the site, with exceedance flows during extreme rainfall events directed to a geo-cellular attenuation tank. A green roof is also proposed on the farmhouse extension. Surface water will ultimately discharge to the future Redrow housing's private surface water drainage network at a restricted rate of 3.8 l/s. This rate was agreed through PL/2023/11008 and demonstrates compliance with Wiltshire Council's Betterment Policy.

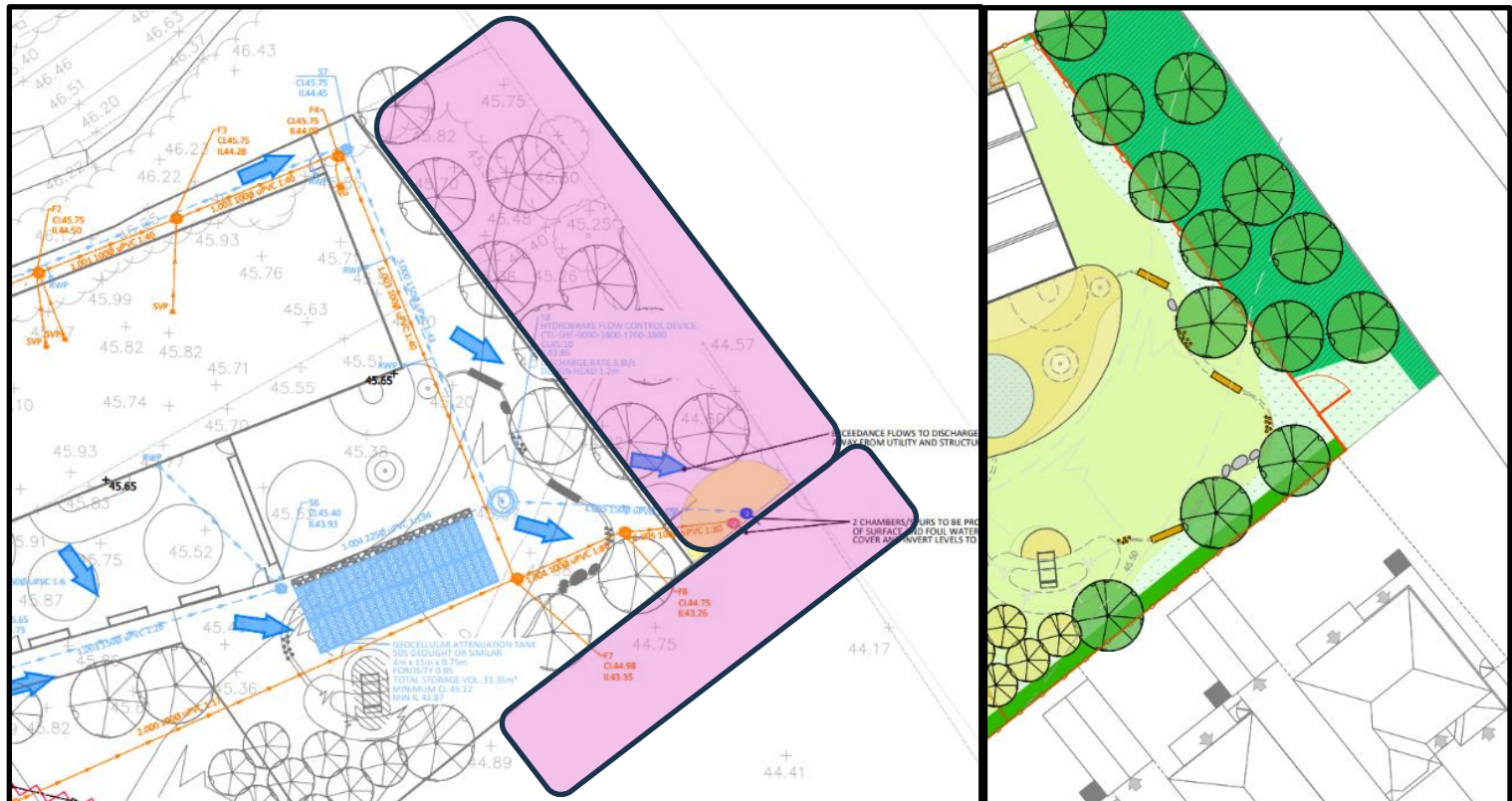
The drainage plan assumes that the Redrow Housing drainage system will be built and working before this development is completed. However, this has not been confirmed. The applicant is required to outline timescales for the completion of Redrow private drainage network, will be and how both developments will be coordinated.

## RECOMMENDATION: Holding objection as further information required:

At this stage, further information is required to demonstrate the proposed drainage strategy is feasible, and that there will be no future detrimental impact on downstream development:

1. We note the applicant has stated in section 3.1 of the Drainage Strategy Statement that Redrow Housing have agreed to accept flows discharged at 3.8l/s. The applicant must provide a statement that demonstrates this agreement with Redrow Housing and acknowledges that any future drainage design and planning application on the Redrow Houses site will include a 3.8l/s discharge.
2. Post-development exceedance routing plans indicate that surface water exceedance flows are directed towards the future proposed development by Redrow Housing and the existing railway corridor.

The applicant is required to submit further details demonstrating how exceedance flows will be safely managed in the pink areas, demonstrating how exceedance will not increase flood risk to the future Redrow Housing development and the existing railway infrastructure. The LLFA would expect the applicant to manage flows onsite, without directing flows towards existing or proposed development.



3. Currently it is unclear when the Redrow Housing drainage strategy will be operational and available to accept the 3.8l/s discharge. The applicant must provide a clear timeline for completion of the proposed drainage strategy development by Redrow Housing.

The applicant must demonstrate that the proposed development will not commence, or will not progress beyond agreed stages, until the Redrow Housing drainage network is in place and operational, or an alternative interim drainage solution has been approved in writing by the Local Planning Authority.

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

- 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:

- A. Cross section and standard detail drawings should be provided for geo-cellular tank and proposed green roof along with their components.
- B. The applicant must submit a construction management plan demonstrating how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction.

## INFORMATIVES

- With regards to the future Redrow Housing development that is accepting surface water flows from this development:
  - The 3.8 l/s discharge must be included in Redrow Housing's surface water drainage model and calculations, to demonstrate there is sufficient capacity in their network, and outline this within any future planning application for their proposed development.
- 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).
- 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 – Letter from Barrat Redrow

David Wilson Redrow South West  
Great Park Road  
Bradley Stoke  
Bristol  
BS32 4PY

8th June 2026

To Wiltshire Council Lead Local Flood Authority,

**Ref PL/2026/01506 – Southview Farm**

We write to confirm that we have coordinated our foul and surface water drainage designs with the Southview Farm site.

We will provide Southview Farm with a foul and surface water drainage connection points at an agreed location within our site boundary.

Our surface water drainage network has been designed to take into account the 3.8 l/s flow that will be discharged from Southview Farm and into our drainage network.

Should the Southview Farm development be constructed ahead of our development, foul water from the site will temporarily connect to the existing foul water pipe currently serving the Southview Farm site, generally in accordance the proposals set out on sketch drawing; 19682-TUM-SK-XXX-0001 Temporary Drainage. We confirm that the existing sewer will not be demolished until a replacement connection for Southview Farm has been provided.

Until our permanent drainage design is implemented attenuated surface water from Southview Farm will discharge via a combination of temporary ditch conveyance and overland flow routes to the culvert crossing beneath the railway line within our site, as shown on the above referenced drawing.

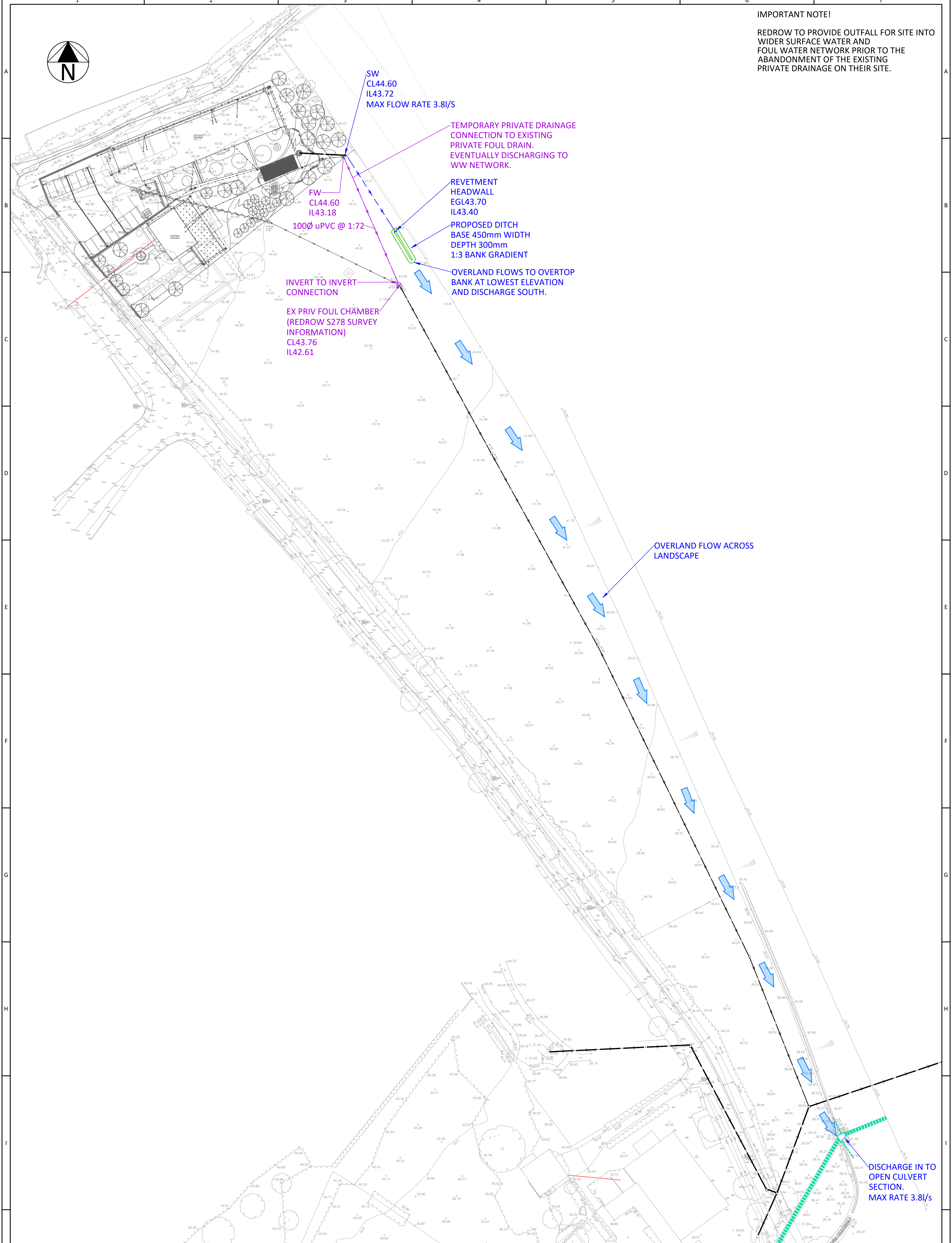
Kind regards



James Kidner

Senior Technical Coordinator

DWR South West



REDROW TO PROVIDE OUTFALL FOR SITE INTO  
WIDER SURFACE WATER AND  
FOUL WATER NETWORK PRIOR TO THE  
ABANDONMENT OF THE EXISTING  
PRIVATE DRAINAGE ON THEIR SITE.

DISCHARGE IN TO  
OPEN CULVERT  
SECTION.  
MAX RATE 3.8l/s

|          |                                  |
|----------|----------------------------------|
| PROJECT: | SOUTH VIEW FARMHOUSE, TROWBRIDGE |
| TITLE:   | TEMPORARY DRAINAGE               |

|                                                |      |
|------------------------------------------------|------|
| Project Ref: Originator: Stage: Phase: Number: | REV: |
| 19682-TUM-SK-XXX-0001                          | A    |