

To:	Gary Collins	From:	Drainage Team
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Planning App Ref:	PL/2025/07678
Service Ref:	Drainage
Date:	14/05/2026

PROPOSAL

Application for approval of Reserved Matters (Appearance and Landscaping) for Infrastructure 1 pursuant to 15/04736/OUT.

SITE LOCATION

Land South East of Trowbridge

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
- SUDs Technical Note
- Attenuation Ponds
- General Arrangement
- Engineering Sheet 1
- Engineering Sheet 2
- Attenuation Ponds E1 and F
- Attenuation Ponds B and E2
- SuDS Note

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 seeks Reserved Matters approval for Phase 1 infrastructure drainage pursuant to the outline planning permission (Ref: 15/04736/OUT).

The proposal comprises a SuDS-based system where surface water is collected via a piped network and attenuated within detention basins and ponds. Surface water is discharged to the River Biss at a controlled rate of approximately 16.26 l/s, with the SuDS Technical Note confirming that flows are restricted below greenfield runoff rates to achieve betterment.

The system is designed to accommodate the 1 in 100-year rainfall event plus climate change and to provide water quality, biodiversity and amenity benefits.

However, interception of the first 5 mm of rainfall (Standard S2) is only partially achieved, with approximately 18% delivered at the infrastructure level and reliance on parcel-level SuDS features.

While the drainage strategy is acceptable in principle, further details are required, including greenfield runoff calculations, attenuation sizing and hydraulic modelling outputs, exceedance routing plans, and clarification and justification of partial compliance with [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#) (Standard 2) compliance.

RECOMMENDATION

No objection subject to the following conditions

- 1. No development must 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 information must be provided:

- Detailed calculations demonstrating the pre-development (greenfield) runoff rates, including methodology, contributing catchment areas and parameters used, to justify the proposed discharge rate of 16.26 l/s.
- Full attenuation sizing calculations must be submitted demonstrating the required storage volumes for each basin/pond, including contributing catchment areas, inflow and outflow rates, critical storm duration, and confirmation that sufficient storage is provided to restrict discharge in accordance with the approved greenfield runoff rates.
- Evidence of hydraulic calculations must be submitted, including summary outputs from the drainage model (e.g. MicroDrainage/InfoDrainage), to demonstrate peak inflows and outflows, storage utilisation, basin water levels, and confirmation that the system operates without flooding for all critical storm events (1 in 1, 1 in 30 and 1 in 100 year events including climate change).
- It is noted that [National Standards for SuDS \(Standard 2\)](#) (interception of the first 5 mm of rainfall) is only partially achieved, with the submitted information indicating that approximately 18.1% of the impermeable area is managed at the infrastructure level. As acknowledged within Section 4.22 of the SuDS Technical Note, interception of the first 5 mm of rainfall was not a requirement at the outline application stage; however, this requirement now applies under the National Standards for SuDS. Further details should therefore be provided to demonstrate how interception can be maximised across the wider development, including through the provision of additional source-control SuDS measures at the parcel level.
- The applicant must submit a plan of the post-development overland exceedance routes for flows in excess of the 1 in 100 year plus climate change rainfall event, that minimise the risk to people and property.
- The application states that foul drainage will discharge to a public sewer. This requires consultation with the sewerage undertaker for the area and evidence of an agreed discharge rate must be demonstrated to Wiltshire Council.
- It should be noted Network Rail land forms the western boundary of the proposed site. Additional or increased flows of surface water should not be discharged onto Network Rail land or into Network Rail's culvert or drains. In the interest of the long-term stability of the railway, soakaways/attenuation ponds should not be constructed within 20 metres of Network Rail's boundary. Any surface water run-off from the site must drain away from the railway boundary and must not drain in the direction of the railway as this could import a risk of flooding and / or pollution onto Network Rail land.
- Further clarification should be provided confirming the factor of safety applied within the drainage design, including justification in accordance with relevant guidance (CIRIA SuDS Manual/National Standard for SuDS), to demonstrate that the system has been designed with adequate allowance for uncertainties
- The applicant must submit a flood evacuation plan to Wiltshire Council for review. The evacuation plan must demonstrate the evacuation plan for any areas of property or

business within Flood Zone 2 and 3 which outline methods for the safe egress and ingress to these areas, while mitigating flood risk to people and property.

- Noting that a maintenance regime has been provided, the applicant must confirm who will be responsible for the operation and maintenance of each element of the drainage system. Where any drainage components are to be maintained by individual plot owners, this responsibility must be clearly secured through the property title deeds to ensure long-term management.

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.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

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](#).

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.