

To:	Gary Collins	From:	Drainage team
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Planning App Ref:	PL/2026/04159
Service Ref:	Drainage
Date:	06/08/2026

PROPOSAL

Approval of details reserved by a condition

Discharge of conditions 3, 5, 6 and 7 of PL/2025/07678 (CEMP, Surface Water Drainage Strategy, Foul Drainage Details and Ecological Enhancement Features)

SITE LOCATION

Land Southeast of Trowbridge

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Appendix 1 to Covering Letter PL 2025 07678 – SW Drainage Response
- Detailed Engineering – Sheet 1
- Detailed Engineering – Sheet 2
- Doc Covering Letter
- General Arrangements Plan
- PL- 2025-07678 Decision
- PL-2025-07678 Location Plan
- Sewer and Rising Main Longsections – Sheet 1
- Construction and Environmental Management Plan- Biodiversity

ASSESSMENT OF THE PROPOSAL

Context

In 2025 The LLFA had the following conditions for which information was required from application PL/2025/07678:

3. No development shall take place until a Construction Environmental Management Plan (CEMP), incorporating pollution prevention measures, has been submitted to approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period.

The CEMP shall include as a minimum the following;

- a scheme to treat and remove suspended solids from the surface run-off during construction
- wheel washing facilities and appropriate disposal of effluent
- the use and routing of heavy plant, vehicles and machinery
- oils/chemicals and materials storage including refueling
- the location and pollution prevention for storage areas and compounds
- the control, storage and removal of spoil and waste.

REASON: To prevent pollution of the water environment in line with paragraph 187 of the National Planning Policy Framework.

5. Notwithstanding the approved plans, 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.

REASON: To ensure a satisfactory form of development with respect to surface water drainage.

6 (foul drainage) & 7 (ecology) do not require comments from the LLFA and consequently have not been discussed as part of this drainage consultation.

Matters relating to the discharge of **Condition 6 (Foul Drainage Details)** should be considered by **Building Control and the relevant sewerage undertaker**, as these matters fall outside the LLFA's responsibilities.

Assessment

The applicant has submitted updated drainage drawings including a revised General Arrangement Plan and Detailed Engineering Drawings and a CEMP: Biodiversity. Comparison with the previous submitted drainage package demonstrates that the overall SuDS strategy remains broadly consistent with the previously assessed under application PL/2025/07678, comprising attenuation ponds, associated drainage infrastructure and controlled discharge arrangement.

Condition 3 (Construction Environmental Management Plan)

The submitted CEMP: Biodiversity includes information relating to construction phasing, ecological protection measures, pollution prevention principles and protection of watercourses. However, further information is required to demonstrate how the proposed construction phasing has been developed to manage flood risk, surface water runoff and pollution risk throughout the construction phase, including temporary drainage arrangements, sediment control measures, protection of the River Biss and sequencing of drainage infrastructure.

An updated CEMP covering these aspects should be provided.

Condition 5 (Surface Water Drainage Strategy)

The revised drainage package remains broadly consistent with the previously assessed strategy and includes a number of design refinements, including 30% runoff betterment, inclusion of Pond F, grassed pond bases, emergency spillways, freeboard provision and updated attenuation pond cross-sections and long-sections. However, insufficient supporting technical evidence has been provided to verify runoff rates, attenuation storage requirements, hydraulic performance and compliance with the [National Standards for Sustainable Drainage Systems \(SuDS\)](#). Further information is therefore required before Condition 5 can be discharged.

Condition 5 cannot be discharged until the following information is submitted and accepted by the LLFA:

- In accordance with [Standard 3 of the National Standards for SuDS](#), overland exceedance routes are to be identified and shown on the drainage plan for flows in excess of the 1 in 100 year plus climate change (40%) rainfall event to demonstrate no adverse flood risk to the development or elsewhere.
- The submitted drawings reference greenfield runoff rates and a 30% runoff betterment. However, the applicant must provide the supporting greenfield runoff calculations, methodology, catchment areas and calculation outputs used to derive the proposed discharge rates and demonstrate how the stated 30% runoff betterment has been achieved.
- Whilst attenuation pond design parameters, storage volumes, discharge rates, pond cross-sections, long-sections, freeboard levels and associated drainage infrastructure details have been provided within the submitted drawings, the applicant should provide the supporting hydraulic calculations and/or modelling outputs (e.g. InfoDrainage or MicroDrainage) used to derive these values. The submitted information should demonstrate the performance of the drainage network and attenuation features during the critical storm duration, including the 1 in 1 year, 1 in 30 year and 1 in 100 year plus climate change rainfall events, and confirm that the system operates without flooding and provides sufficient attenuation storage capacity.
- The applicant must provide detailed standard headwall drawings and details, in addition to any associated outfall construction details.
- Further information demonstrating the extent to which the first 5mm rainfall will be intercepted across the development as a whole, including details of the parcel-level source control SuDS measures relied upon, the anticipated interception performance of those features and evidence that interception has been maximised in accordance with [National Standards for SuDS \(Standard 2\)](#).
- It should be noted that Network Rail landforms the western boundary of the site. Whilst the submitted drainage strategy indicates discharge to the wider surface water drainage network and attenuation features, the applicant should confirm that no additional surface water runoff will be discharged onto Network Rail land or into Network Rail drainage assets and that surface water runoff will be directed away from the railway boundary.
- Applicant should provide an updated drawing overlaying Flood Zones 2 and 3 onto the submitted drainage strategy and site layout plans, including the proposed attenuation ponds, bunds, outfalls and associated drainage infrastructure. The submitted information should demonstrate whether any drainage infrastructure is located within the floodplain and confirm that the proposals will not result in any loss of floodplain storage, obstruction of flood flow routes, raising of ground levels or increase in flood risk elsewhere.
- 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 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.