

Project: Southview Farmhouse, Trowbridge

Subject: Response to LLFA Comments

Reference: 19682-TUM-TN-XXX-0001

Date	Details	Rev	Author	Checked by
5 th August 2026	First issue	A	RP	BF

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 09/07/2026 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:

1. Discharge to Redrow Housing development

The LLFA acknowledges the consent letter provided by Barratt Redrow, confirming that surface water drainage connection points have been agreed within their site boundary. It is also noted that their surface water drainage network has been designed to accommodate a discharge of 3.8 l/s from Southview Farm into their system.

2. Exceedance routing

The applicant has provided comments to justify the proposed exceedance strategy; however, it appears that the underlying concern has been misunderstood. While the LLFA acknowledges that ground levels within Areas 1 and 2 are not proposed to change, the increase in impermeable area across the site, together with the need to consider potential drainage system failure scenarios, means that overland flow volumes passing through these areas may increase.

Given that these exceedance flows are currently directed off-site towards neighbouring development and existing infrastructure, the proposed arrangement is not acceptable. The applicant should therefore propose measures to intercept, manage, and contain flows within the site boundary to ensure that no increased flood risk or adverse impact is imposed on adjacent land, property, or infrastructure.

3. Construction phasing

In the event where the Southview Farm development may be constructed ahead of the Barratt Redrow development, the applicant proposes to discharge surface water via a combination of temporary ditch conveyance and overland flow routes to the culvert beneath the railway within the site. This approach is not considered acceptable by the LLFA.

There is uncertainty regarding how overland exceedance flows will be directed towards the culvert, raising concerns that flows may not be effectively conveyed and could increase flood risk to the existing railway track.

There is also uncertainty regarding how surface water drainage will be managed during the Barratt Redrow construction phase, which may result in exceedance flows not being adequately controlled, increasing flood risk to the railway and adjacent development.

The LLFA considers that a more robust and formalised drainage solution is required to ensure discharge from Southview Farm is properly conveyed to the culvert in a controlled manner.

The applicant would also be required to obtain Land Drainage Consent, demonstrate sufficient culvert capacity, and secure agreement with Barratt Redrow to ensure drainage is maintained during construction, until connection to their drainage network is completed in accordance with the approved strategy.

Refer to the contours shown in the figure below, which illustrate the site topography. (Source: SCALGO).



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
1. The LLFA acknowledges the consent letter provided by Barratt Redrow, confirming that surface water drainage connection points have been agreed within their site boundary. It is also noted that their surface water drainage network has been designed to accommodate a discharge of 3.8 l/s from Southview Farm into their system.	Noted

Wiltshire LLFA Comment	Tumu Response
2. The applicant has provided comments to justify the proposed exceedance strategy; however, it appears that the underlying concern has been misunderstood. While the LLFA acknowledges that ground levels within Areas 1 and 2 are not proposed to change, the increase in impermeable area across the site, together with the need to consider potential drainage system failure scenarios, means that overland flow volumes passing through these areas may increase. Given that these exceedances flows are currently directed off-site towards neighbouring development and existing infrastructure, the proposed arrangement is not acceptable. The applicant should therefore propose measures to intercept, manage, and contain flows within the site boundary to ensure that no increased flood risk or adverse impact is imposed on adjacent land, property, or infrastructure.	An extract from the Wiltshire LLFA comments dated 09/07/2026 has been reproduced below. The areas highlighted in pink have been labelled Area 1 and Area 2 for ease of reference.  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. The drainage has been designed to attenuate all surface water from the development within the drainage system for all storms up to and including the 1% AEP with a 45% allowance for climate change ie The exceedance routes are used for rainfall events in excess of the 1% AEP with a 45% allowance for climate change. CIRIA C635 (<i>Designing for Exceedance in Urban Drainage</i>) provides guidance on the safe routing and management of exceedance flows. We are not aware of any requirement within either the National Standards for Sustainable Drainage Systems or CIRIA guidance that requires all exceedance flows from rainfall events exceeding the 1% AEP event (including climate change) to be contained entirely within the site boundary. The proposed exceedance routes shown replicate the current exceedance flow routes. Surface water currently discharges from the existing farmhouse eastwards due to the topography of the land. By providing 1 no. tank and 2 no. permeable paving sub base that collects and attenuates flows up to the 1% AEP event + 45 % climate change, we are providing a betterment on the existing scenario. However, as the client wishes to progress without further rebuttal, it is proposed to introduce a 500mm high bund on the south east corner of the site. The total exceedance storage area is 91m² with an approximate storage volume of 22m³. The bund will intercept and hold any exceedance flows temporarily, before percolation into the ground. Refer to Appendix C for the updated Drainage Strategy Drawing.

Wiltshire LLFA Comment	Tumu Response
3. In the event where the Southview Farm development may be constructed ahead of the Barratt Redrow development, the applicant proposes to discharge surface water via a combination of temporary ditch conveyance and overland flow routes to the culvert beneath the railway within the site. This approach is not considered acceptable by the LLFA. There is uncertainty regarding how overland exceedance flows will be directed towards the culvert, raising concerns that flows may not be effectively conveyed and could increase flood risk to the existing railway track. There is also uncertainty regarding how surface water drainage will be managed during the Barratt Redrow construction phase, which may result in exceedance flows not being adequately controlled, increasing flood risk to the railway and adjacent development. The LLFA considers that a more robust and formalised drainage solution is required to ensure discharge from Southview Farm is properly conveyed to the culvert in a controlled manner. The applicant would also be required to obtain Land Drainage Consent, demonstrate sufficient culvert capacity, and secure agreement with Barratt Redrow to ensure drainage is maintained during construction, until connection to their drainage network is completed in accordance with the approved strategy.	The temporary surface water arrangement has been amended. In the event that the South View Farmhouse development is completed prior to the Redrow development, the discharge of surface water will temporarily be discharged to the ditch on the eastern side of the southern field. Refer to Appendix C for the Temporary Drainage Layout. Surface water will be conveyed by a ditch before discharge at a maximum of 3.8l/s for all storms up to and including the 1% AEP with an allowance for climate change. It should be noted that the development proposed to discharge to this ditch in the previously consented application, PL/2023/11008. Under no circumstances should infilling of this ditch take place downstream of the temporary connection point, prior to the provision of a connection to the Redrow surface water drainage network, and it should be accounted for within Redrow's construction sequencing.

Table 1 Tumu Responses to the LLFA Comments

Appendix A – LLFA Comments

To:	Jemma Foster	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01506
Service Ref:	Drainage
Date:	09/07/2026

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	X
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application form (March 2026)
- Location plan (March 2026)
- Demolition plan (March 2026)
- Existing barn drawings (March 2026)
- Planning statement (March 2026)
- Drainage documentation and strategy statement (March 2026)
- Existing site plan (March 2026)
- Existing garage and farmhouse drawings (March 2026)
- Proposed site plan and site access (May 2026)
- Proposed farmhouse and nursery (March 2026)
- Design and access statement (May 2026)
- Drainage Strategy (May 2026)
- Drainage Technical Note (May 2026)

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 applicant has reconsulted with revised surface water drainage strategy, in order to address the issues raised in the previous drainage response issued on 17/04/2026.

1. Discharge to Redrow Housing development

The LLFA acknowledges the consent letter provided by Barratt Redrow, confirming that surface water drainage connection points have been agreed within their site boundary. It is also noted that their surface water drainage network has been designed to accommodate a discharge of 3.8 l/s from Southview Farm into their system.

2. Exceedance routing

The applicant has provided comments to justify the proposed exceedance strategy; however, it appears that the underlying concern has been misunderstood. While the LLFA acknowledges that ground levels within Areas 1 and 2 are not proposed to change, the increase in impermeable area across the site, together with the need to consider potential drainage system failure scenarios, means that overland flow volumes passing through these areas may increase.

Given that these exceedance flows are currently directed off-site towards neighbouring development and existing infrastructure, the proposed arrangement is not acceptable. The applicant should therefore propose measures to intercept, manage, and contain flows within the site boundary to ensure that no increased flood risk or adverse impact is imposed on adjacent land, property, or infrastructure.

3. Construction phasing

In the event where the Southview Farm development may be constructed ahead of the Barratt Redrow development, the applicant proposes to discharge surface water via a combination of temporary ditch conveyance and overland flow routes to the culvert beneath the railway within the site. This approach is not considered acceptable by the LLFA.

There is uncertainty regarding how overland exceedance flows will be directed towards the culvert, raising concerns that flows may not be effectively conveyed and could increase flood risk to the existing railway track.

There is also uncertainty regarding how surface water drainage will be managed during the Barratt Redrow construction phase, which may result in exceedance flows not being adequately controlled, increasing flood risk to the railway and adjacent development.

The LLFA considers that a more robust and formalised drainage solution is required to ensure discharge from Southview Farm is properly conveyed to the culvert in a controlled manner.

The applicant would also be required to obtain Land Drainage Consent, demonstrate sufficient culvert capacity, and secure agreement with Barratt Redrow to ensure drainage is maintained

during construction, until connection to their drainage network is completed in accordance with the approved strategy.

Refer to the contours shown in the figure below, which illustrate the site topography. (Source: SCALGO).

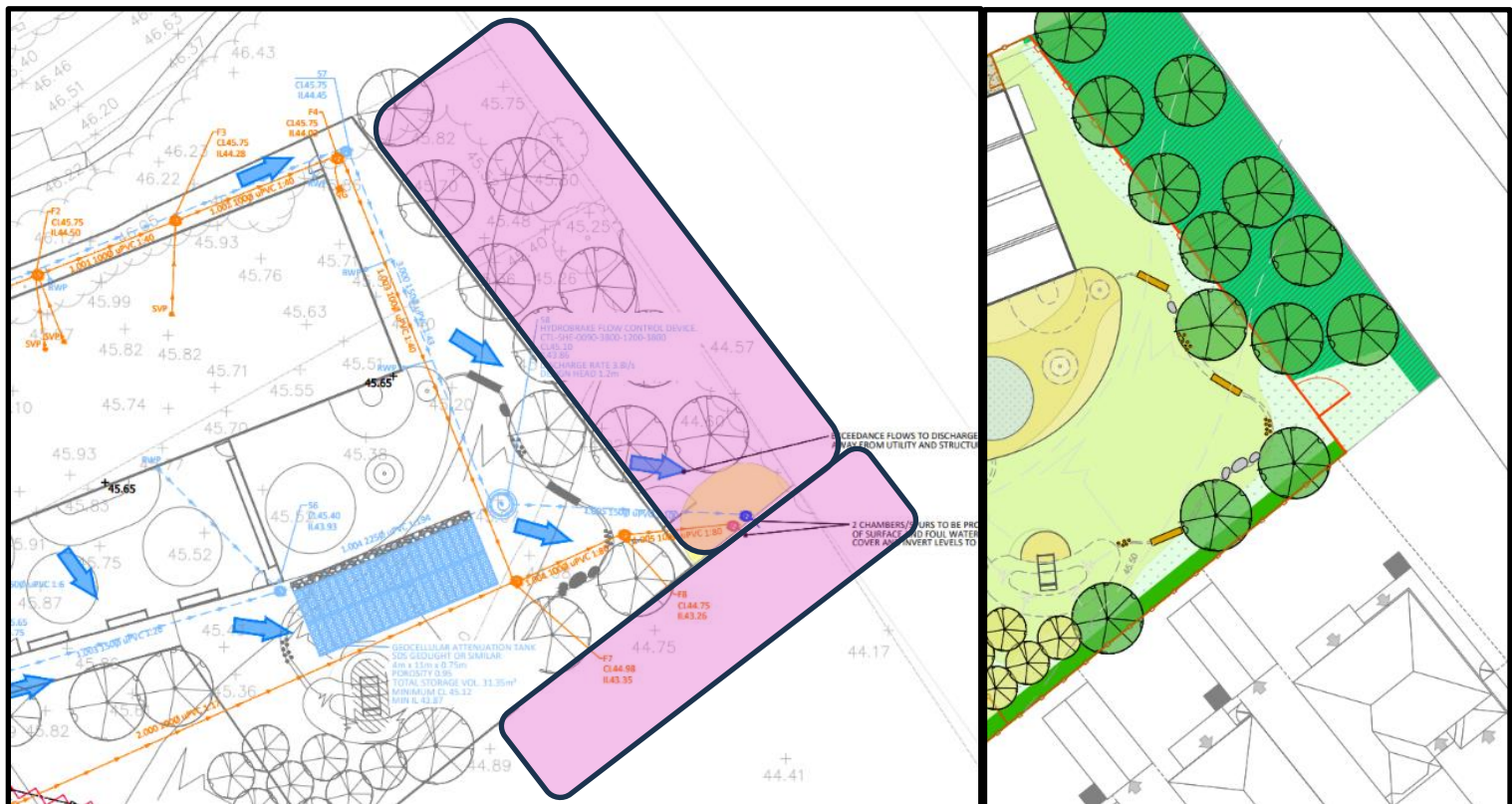


RECOMMENDATION: Holding objection as further information required:

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. 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.



2. Currently it is unclear when the Redrow Housing drainage strategy will be operational and available to accept the 3.8l/s discharge. The applicant has proposed an interim solution should this connection not be available. However, the LLFA considers that a more robust and formalised drainage solution is required to ensure discharge from Southview Farm is properly conveyed to the culvert in a controlled manner, should the formal connection not be available.

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](#)

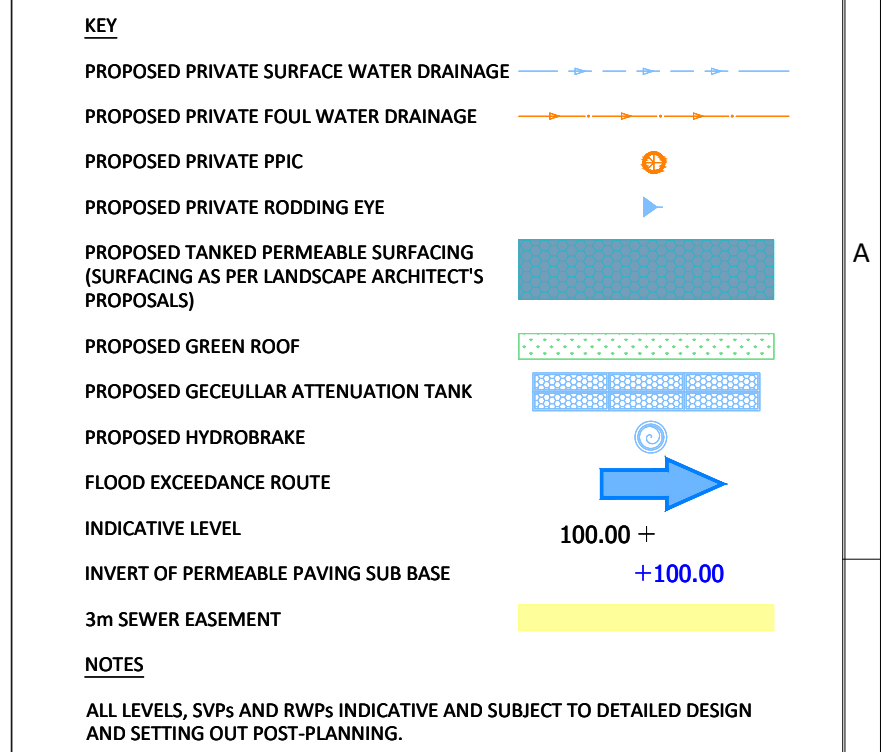
Establishes mandatory criteria for runoff destination hierarchy, interception, flood resilience, water quality, amenity, biodiversity, and long-term maintenance for all new developments in England.

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 – Drainage Strategy



Appendix C – Temporary Drainage Diversion

