

To:	Verity Giles-Franklin	From:	Drainage Team (Arun Govind T)
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Planning App Ref:	PL/2026/04502
Service Ref:	Drainage
Date:	16/09/2026

PROPOSAL

Full planning permission

Full planning application for the demolition of existing dwelling ('Uplands') and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.

SITE LOCATION

Uplands, West Ashton Road, Trowbridge, BA14 6DW

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
- Design and Access Statement
- Existing Site Plan
- Flood Risk Assessment & Drainage Strategy (with Appendices) - 1 of 6
- Flood Risk Assessment & Drainage Strategy (with Appendices) - 2 of 6
- Flood Risk Assessment & Drainage Strategy (with Appendices) - 3 of 6
- Flood Risk Assessment & Drainage Strategy (with Appendices) - 4 of 6
- Flood Risk Assessment & Drainage Strategy - 5 of 6
- Flood Risk Assessment & Drainage Strategy (with Appendices) - 6 of 6
- Fluvial Modelling Study (with Appx) 1 of 2
- Fluvial Modelling Study (with Appx) 2 of 2
- Location Plan
- Planning & Affordable Housing Statement
- Proposed Context Site Plan
- Proposed Site Plan (Colour)

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 has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

The LLFA's assessment relates to flood risk, water quantity, water quality and maintenance considerations. The proposed SuDS may also have implications for biodiversity, amenity, landscape, green infrastructure and placemaking objectives. Assessment of these matters falls outside the remit of the LLFA. The Local Planning Authority should seek and have regard to the advice of Wiltshire Council's Ecology, Landscape, urban design and other relevant specialist teams when considering these aspects of the proposal.

A part of the site is located within Flood Zones 2 and 3. The applicant has confirmed that no built development is proposed within areas falling in Flood Zones 2 and 3. It is also noted that the Environment Agency has advised that detailed flood risk modelling is unavailable for Blackball Brook. In addition, the Strategic Flood Risk Assessment (SFRA) identifies a portion of the site as being at high risk of surface water flooding.

Surface water runoff is proposed to be conveyed to attenuation basins and discharged at a controlled rate to Blackball Brook, located to the south of the site.

The applicant states that, under existing conditions, runoff generated within the greenfield areas either infiltrates into the ground or flows overland in a southerly direction towards Blackball Brook. However, infiltration testing undertaken across the site indicates that infiltration drainage is not a feasible option.

Groundwater monitoring recorded groundwater levels ranging between 0.17 m and 1.37 m below ground level. Additional evidence is required to demonstrate that the base level of the proposed attenuation basin will remain above the highest recorded groundwater level or suitable measures are included to prevent groundwater ingress.

An error has been identified within the interception calculations for Catchment 1. The calculation of $(319 \times 5) + 510$ has been stated as 2,113 m², whereas the correct value is 2,105 m². Given that the proposed impermeable catchment area is stated as 2,106 m². The applicant should revise these calculations to demonstrate that interception storage is provided in accordance with Standard 2 of the National Standards for SuDS.

The submitted drainage layout does not identify pipe or node reference numbers and cannot be considered in conjunction with the submitted calculations. Both the drainage layout and calculations should identify pipe and node numbers.

The applicant notes that InfoDrainage software was unable to calculate half-drain times for the proposed attenuation features under the 1 in 30 year rainfall event. For Pond 2, a half-drain time of 2,090 minutes has been reported for the 1 in 100 year plus 45% climate change event.

The drainage model has applied a runoff coefficient (Cv) of 0.75 to impermeable catchment areas. A coefficient of 1.0 should be used for impermeable surfaces, and the drainage calculations should be updated accordingly.

The results of the sensitivity analysis indicate flooding within Attenuation Basin 1 under surcharged outfall conditions.

The applicant states that exceedance flows would follow the existing site topography and drain southwards towards Blackball Brook without affecting the proposed dwellings. However, a detailed exceedance flow routing plan is required to demonstrate that exceedance flows will be safely directed away from buildings and towards designated safe areas.

The applicant has stated that the access road will be sites within the modelled 1 in 100 year + climate change flood extent, and that flood plain compensation will be provided. The applicant should provide further detail regarding this, including the volume of compensation storage required and where it will be provided.

Cross-section drawings and standard construction details for the proposed attenuation basins, permeable paving system, and all associated components have not been provided.

RECOMMENDATION

No objection subject to the following conditions

- 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:

- Calculations that demonstrate that the surface water drainage strategy satisfies the following:
 - The 1 in 30 year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement).
 - The site has been designed to ensure that flows in excess of the 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.
- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.
- Evidence that an allowance for reduced attenuation volume due to silt ingress has been considered for the attenuation basins (as per Section 21.9.9 of the SuDS Manual CIRIA C753).
- The applicant should detail any requirements, and plans, for flood plain compensation across the site.
- The drainage drawings should show the pipe / link & manhole / node numbers used in the calculations in order to link the drawing with the detailed calculations.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- 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 of elsewhere.
- The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

As-Built SuDS and Watercourse/Ditch Modification Drawings (AutoCAD Format)

No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer shall submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:

1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
2. As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
 - AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
 - PDF format for record purposes.
4. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.
5. An updated SuDS Maintenance Plan reflecting the final as-built arrangement.

The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system.

Reason:

To ensure the constructed drainage system and watercourse/ditch modifications accord with the approved design, to maintain accurate LLFA drainage records, and to ensure the development does not increase flood risk on- or off-site, in accordance with the NPPF and Wiltshire Council SuDS guidance.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- 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.
- 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](#).

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.