

To:	Gary Collins	From:	Drainage (Cecily Austin)
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Planning App Ref:	PL/2026/05190
Service Ref:	Drainage
Date:	23/09/2026

PROPOSAL

Approval of details reserved by a condition

Discharge of conditions 11, 22, 23 and 25 of 15/04736/OUT (Tree Protection, Surface Water Discharge, Sewage Disposal Details and External Lighting).

SITE LOCATION

Land south east of Trowbridge

APPLICATION DOCUMENTS REVIEWED

- 15-04736-OUT - Decision Notice
- 15-04736-OUT - Location Plan
- Conditions 22 and 23 - Attenuation Ponds - Sheet 1
- Conditions 22 and 23 - Attenuation Ponds - Sheet 2
- Conditions 22 and 23 - General Engineering and Drainage Strategy
- Conditions 22 and 23 - Infrastructure National Standards for SuDS Drainage Note
- Conditions 22 and 23 - Network 1 SWS Calcs
- Conditions 22 and 23 - Network 2 SWS Calcs
- Conditions 22 and 23 - Network 3 SWS Calcs
- Conditions 22 and 23 - Surface Water Catchments
- Covering Letter

ASSESSMENT OF THE PROPOSAL

Context

PL/2026/05190 relates to a schedule of conditions from 15/04736/OUT

Surface water drainage matters are relevant to Condition 22 and 24, and are considered below:

22) No development in any particular Phase or sub Phase of the development or associated with the Yarnbrook and West Ashton Relief Road in isolation shall commence on site until a scheme for the discharge of surface water from the Phase or sub Phase or from the Relief Road in isolation, incorporating sustainable drainage details, and any related programme for delivery, has been submitted to and approved in writing by the Local Planning Authority. The development within the Phase shall not be first occupied and/or the Relief Road shall not be first used by non-construction traffic until surface water drainage has been constructed in accordance with the approved scheme(s) and related programme(s).

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in any phase in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

24) There shall be no surface water drainage connection from this development to the foul water system.

REASON: To safeguard the integrity of the foul water system.

Condition 23 is related to foul water drainage and therefore has not been assessed. Condition 11 does not relate to drainage matters and therefore is not considered as part of this response.

Assessment

Condition 22 Assessment

In the submitted Technical Note, the applicant has reviewed all seven National Standards for SuDS. Compliance with the proposed drainage strategy has been assessed below on a standard-by-standard basis.

Standard S1 – Management of Surface Water Runoff

Infiltration testing was undertaken on site, and it was demonstrated that infiltration is not a viable discharge option. The applicant therefore proposes to discharge surface water to an existing watercourse, in accordance with the drainage hierarchy.

It is noted that rainwater harvesting is not proposed as part of the development. This is discussed within Section 3 of the technical note, which states that implementation is not considered technically feasible within the site design constraints. It is also noted that planning permission for the development was granted prior to this requirement becoming mandatory under the National Standards for SuDS. As such, the LLFA raises no objection on these grounds. However, given the anticipated demand for non-potable water across the wider development, the LLFA recommends that the applicant consider the incorporation of water butts and other rainwater harvesting measures at both the individual property and commercial scales, where feasible.

Standard S2 – Interception and Source Control

Interception has been considered as part of the drainage strategy, and it is acknowledged that full compliance with this standard has not been achieved. However, this has been discussed and justified within the submitted report. It is noted that source control features have not been incorporated within the strategic highway infrastructure due to limited highway corridor widths, highway adoption constraints, and the intention for source control SuDS measures to be delivered within the individual development parcels.

It is also noted that compliance with this standard was not a mandatory requirement at the time outline planning permission was granted. The applicant has maximised interception within site where practicable. Therefore, whilst full compliance with the standard has not been achieved, the LLFA considers the approach acceptable given the identified constraints and the efforts made to satisfy the requirements of the standard as far as reasonably possible.

Standard S3 – Management of Extreme Rainfall and Flood Risk

Flows are proposed to be restricted to the agreed greenfield runoff rate, including a 30% betterment, as per Wiltshire Council's Standards. It is also noted that freeboard has been provided within all proposed basins.

However, a proposed culvert is shown on the submitted drainage drawings (see screenshot below), and no supporting information has been provided regarding its design or operation. Further details are therefore required, including the proposed arrangement, cross-sections, hydraulic capacity and evidence demonstrating that the culvert will not increase or exacerbate flood risk either on or offsite.

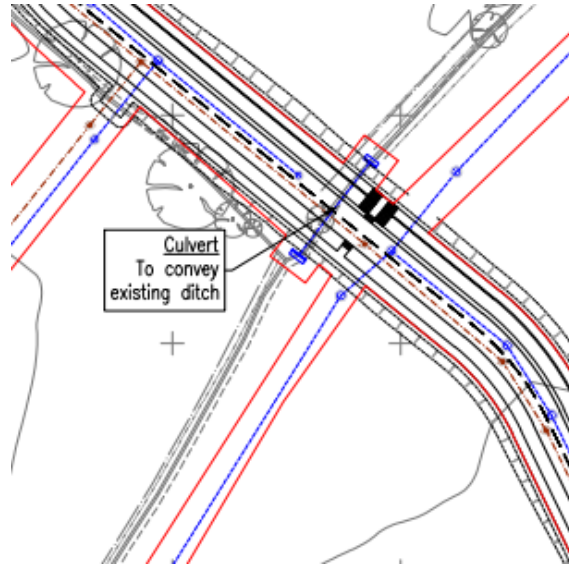


Figure 1: Proposed ditch noted on submitted drainage drawings

Standard S4 – Water Quality

A water quality management train has been incorporated into the drainage strategy. The applicant has applied the Simple Index Approach to demonstrate that appropriate treatment and mitigation will be provided through the proposed SuDS features. The LLFA is satisfied that the proposals meet the requirements of this standard.

Standards S5 and S6 – Amenity and Biodiversity

The proposed detention basins, attenuation ponds, and the potential for additional SuDS features within the parcel drainage strategies, including swales and rain gardens, enable both Standards S5 and S6 to be met. The strategy prioritises the use of above-ground green SuDS features throughout the site, providing amenity and biodiversity benefits. Furthermore, a number of basins are proposed with a permanent water level (maximum depth of 1m), which will provide further biodiversity benefits.

Standard S7 – Design for Maintenance Considerations

It is noted that the drainage proposals have been designed in accordance with the relevant DCG standards. An operation and maintenance plan has been provided within Appendix A of the technical note and is considered satisfactory.

Condition 24 Assessment

It is noted that surface water runoff is proposed to discharge to ditches within and surrounding the site. No surface water discharge to the foul sewer network is proposed meaning this condition has been satisfactorily addressed.

RECOMMENDATIONS

Condition 24 can be fully discharged. However, Condition 22 cannot be discharged until further details regarding the proposed on-site culvert are provided, in order to demonstrate compliance with Standard S3 of the National Standards for SuDS.

The following information should be submitted to enable this assessment:

- Further details of the proposed culvert, including a description of the works and associated drawings. This should include cross-sections showing the proposed pipework and any associated earthworks required to facilitate the culverting.
- Sufficient supporting information should be provided to demonstrate that the proposed culvert will not increase or exacerbate flood risk on-site or elsewhere, and that it has sufficient capacity to accommodate existing and proposed flows.

Upon receipt of the above information, the LLFA will be able to undertake a full assessment of the proposed culverting works and determine whether Condition 22 can be discharged.

INFORMATIVES

- 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.
- The applicant must ensure a copy of the drainage strategy & accompanying maintenance regime is included in the title deeds of the property.
- 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.
- 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.