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Planning App Ref:	PL/2026/02134
Service Ref:	Drainage
Date:	14/05/2026

PROPOSAL

Outline planning permission for up to 315 dwellings with associated access and infrastructure including Suitable Alternative Natural Greenspace. All matters are reserved except for access.

SITE LOCATION

Land North and South of Stones Lane, and North of Malmesbury Road, Cricklade, SN6 6JP

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
- Site Location Plan
- Design and Access Statement
- Flood Risk Assessment & Drainage Strategy

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 Flood Risk Assessment (FRA) confirms that the development site is located within Flood Zone 1, indicating a low probability of fluvial flooding. The assessment also identifies a negligible risk of groundwater flooding. A surface water flow route is present across the site during the 1 in 30-year (3.33%) rainfall event, running generally west to east. This flow route follows the existing hedge line and is conveyed within an established ditch feature. The proposed site layout has been designed to retain and protect this flow route. Areas at high-risk surface water flooding are identified to the north of the southern parcel and within parts of the northwestern parcel; however, no development is proposed within these areas, ensuring that the proposed development is at low flood risk.

The applicant proposes the development of up to 315 residential units, together with associated infrastructure including roads, driveways, soft landscaping, and Sustainable Drainage Systems (SuDS), across a land parcel measuring approximately 20.72 hectares. The site is divided into two distinct parcels: the southern parcel, extending to approximately 17.22 hectares, which will accommodate the residential development; and the northwestern parcel, measuring approximately 3.50 hectares, which is proposed to be delivered as Suitable Alternative Natural Greenspace (SANG).

At this stage, detailed layout plans for the proposed development have not been provided. The submitted information is limited to the indicative boundary of the residential development area, along with the proposed internal road network and site access arrangements.

A drainage network layout plan, supporting calculations, and pre- and post-development exceedance flow diagrams have been submitted as part of the FRA. The proposed drainage strategy includes attenuation of surface water runoff via three attenuation basins, with controlled discharge to an existing land drain to the east of the site, potentially via a connection beneath Stones Lane.

However, the drainage layout plan lacks sufficient annotation, including pipe sizes, manhole references, invert levels, and gradients, preventing the drainage calculations from being clearly correlated with the proposed surface water network. In addition, the pre- and post-development exceedance flow diagrams do not show proposed topographical levels, which limits the ability to assess overland flow routes and the effectiveness of flood routing across the site.

The assessment of discharge betterment in accordance with Wiltshire Council's betterment policy is based on the north-western catchment and assumes a 60% impermeable area; however, no development is proposed within this catchment. It is noted that the controlled discharge rate would be lower when calculated based on 60% of the developable area of 8.87 hectares. However, currently no clear identification of the individual catchments mentioned under section 5.14 of the FRA. A suitably scaled plan with clearly demarcated catchment

boundaries should therefore be provided. In addition, discrepancies have been identified in the reported total development area between Table 4 of the Flood Risk Assessment and Page 34 of the Design and Access Statement, which require clarification

Furthermore, the applicant has indicated that rainwater harvesting has not been considered in the current drainage strategy. But it is proposed that this will be assessed at the reserved matters or full application stage, following the finalisation of the site layout. This intention should be clearly reflected within the submitted drainage strategy.

The calculation results provided include the 1 in 100 year plus 40% climate change and an additional 10% allowance, which indicates flooding within the drainage network. That said, no corresponding calculations have been submitted for the 1 in 100 year plus 40% climate change event alone to demonstrate that the system remains free from flooding for this design scenario.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

1. A clear and fully annotated plan identifying all surface water catchments draining the site, with catchment boundaries and outfalls explicitly demarcated and consistent with the areas used within the greenfield runoff rate calculations.
2. The applicant's detailed drainage strategy must demonstrate that the required 30% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100-year return period storm events. This takes account of national policy, as outlined in the SuDS Technical Standards. Should the drainage design be subsequently updated, any resulting change in discharge rate must be reflected and justified within an updated drainage strategy.
3. A detailed surface water drainage model prepared using Causeway Flow (MicroDrainage or other agreed industry-standard software) shall be provided Due to the scale and complexity of the proposed development. This will enable better technical review and provide a clearer understanding of the proposed drainage strategy.
4. Evidence shall be provided to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS. Calculations that demonstrate compliance with these interception requirements should be provided.
5. 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.
6. Updated drainage calculations demonstrating that:
 - No flooding on site will occur for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
7. A detailed post-development exceedance flow plans demonstrating that flood risk is not increased on site or elsewhere as a result of the development. The plans shall be supported by existing and proposed site topographical levels to clearly show overland flow paths, and exceedance routing.

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant during the Reserved Matters

Application:

The following additional information must be provided:

- In accordance with Standard 1 of National Standards for SuDS, rainwater harvesting shall be considered.
- The applicant shall implement SuDS source-control measures to manage surface water quantity and maintain water quality wherever possible, and throughout the SuDS management train, to ensure that the development does not rely on large attenuation features located close to points of discharge, thereby reducing the risk of pollution to receiving watercourses and/or groundwater, in accordance with Standard 4 of the National Standards for SuDS.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.

- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion
- The applicant shall submit a pollution hazard assessment for all areas draining to SuDS features and demonstrate, using the Simple Index Approach (CIRIA SuDS Manual C753, Table 26.3), that the proposed SuDS treatment train achieves the required pollution mitigation indices for suspended solids, metals and hydrocarbons. The drainage design shall incorporate a minimum of two stages of treatment for runoff from high-risk areas (such as roads and car parks) and at least one stage of treatment for runoff from low-risk areas (such as roofs). Supporting calculations and plans shall be provided to demonstrate compliance, in accordance with Standard 4 of the National Standards for Sustainable Drainage Systems.

INFORMATIVES

- 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).
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.
- Any new connections to sewers will be subject to S106 agreement under the Water Industry Act with the Sewerage Undertaker
- 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.

- 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.