

Wiltshire Council Planning Consultation Response

14th May 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Application No: PL/2023/10331

**OUTLINE PLANNING APPLICATION (WITH ALL MATTERS EXCEPT ACCESS RESERVED) FOR
“UP TO 49 DWELLINGS AND ASSOCIATED WORKS AND PROVISION OF A CEMETERY
TOGETHER WITH ACCESS AND ASSOCIATED WORKS.”**

LAND SOUTH OF THE FORTY AND NORTH OF CHELWORTH ROAD, CRICKLADE, WILTSHIRE

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

☐	No Comment
☐	Support
☒	Support subject to conditions (please set out below)
☐	Object (for reasons set out below)
☐	No objections

Matters Considered:

Documents Reviewed:

- *Application Form Redacted*
- *Cover Letter*
- *Flood risk Assessment – July 2025*
- *Site Location Plan*
- *Topographical survey*
- *Planning Statement*
- *Illustrative Layout*
- *Indicative Layout Masterplan*
- *Tier 2 Groundwater Risk Assessment*
- *Hydraulic Modelling Technical Note – June 2025*
- *Email from Planning Agent explaining site sections*
- *Site Sections – HH001-04*

The application is an outline application 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.

This response is related to the housing development, not the cemetery. Following our initial objection, the applicant has undertaken additional flood modelling to more accurately quantify the flood risk to the site. We are satisfied that the applicant can demonstrate that they have a viable drainage strategy which will not increase flood risk elsewhere (subject to the full details being agreed).

The additional modelling demonstrates that the dwellings will not be at a significant risk of surface water flooding.

The applicant is proposing betterment with regards the discharge rates from the development; runoff will not be increased as a result of the development, and will be reduced to 3.7l/s maximum - this provides significant betterment compared to existing in line with the council's betterment policy. Even if there is issue with rainwater entering the combined system and causing surcharge, the applicant could demonstrate that they would not be making the existing scenario any worse than existing.

This response does note reports of flooding in close proximity to the proposed development site, raised by Cricklade Parish Council. This response also accounts for the updated National Planning Policy Framework (as 12 December 2024).

As Thames Water have confirmed they will model & construct a new foul network. Once Thames Water have confirmed the proposed design, the applicant should provide the relevant information to the LLFA. This could be reasonably enforced as a condition on the site to ensure that the development will not exacerbate the existing risk. Based on the commitment from Thames Water, the development may help expedite resolving the existing foul flooding issues within Cricklade. TW will commonly only commence the investigations into asset upgrades once planning is in place (as that helps set internal budgets and business cases).

The LLFA have reviewed the additional information, however this does not change the drainage position.

Condition:

1. Prior to commencement, the applicant shall agree the detailed drainage strategy with the LPA. This shall include:

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- A plan showing the cross sections and design of any attenuation pond and its components.
- A manhole / inspection chamber schedule to include cover and invert levels.
- Calculations that demonstrate the 1 in 30 year + climate change rainfall is contained within the drainage system without causing flooding to any part of the site.
- Calculations that demonstrate that the 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
- Calculations that demonstrate the proposed drainage design provides a sufficient level of treatment so as to mitigate the risk of pollution to SPZ 2 and SPZ3.
- Plans to demonstrate that 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.
- No development shall commence on site until the applicant has undertaken a sensitivity analysis on the network considering surcharged outfall conditions to ensure that any flooding resulting from a surcharged outfall will not affect people or property.
- The applicant is proposing to re-profile the site as part of the development. The re-profiling will remove topographic depressions withing the site which are currently subject to surface water flooding. The applicant must provide evidence that adequate storage for displaced surface water flows can be provided elsewhere within the site.
- Given the depth of the attenuation basin, we would expect to see the basin designed in accordance with the health and safety requirements set out in Chapter 36 of the CIRIA SuDS Manual C753.
- In the trial pit TP03, it was observed that the groundwater was encountered at 0.80 m bgl on 22nd June 2023. Hence, the applicant should provide details of this groundwater strategy at the same level of granularity as the surface water drainage strategy.
- The applicant must demonstrate that a min. 30% betterment can be provided on all discharge rates, including the 1 in 1 year year greenfield rate, as per Wiltshire Council's betterment strategy.
- If a value other than 0m³/ha is selected for the MADD value, the applicant will need to provide quantitative evidence to demonstrate that this is appropriate.
- The applicant must provide details of the proposed ground reprofiling, and an assessment of how this will impact flood risk. It is accepted that this can only be provided as part of detailed design. The applicant will have to

demonstrate that flood risk is not increased to people or property within the proposed development, or on adjacent land.

2. **No development shall commence until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details:**

In order to discharge the above drainage condition the following additional information must be provided:

- A construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase.
- An Operation and Maintenance Plan that details maintenance activities, their frequency, and those responsible for them, for all elements of the drainage system.

Informatives

National standards for sustainable drainage systems (SuDS) ([National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#)):

- The applicant should note that in all instances the preference should be to utilise blue-green SuDS which provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity); for example, for attenuation features preference should be given to use of swales / ponds / detention basins (if technically feasible) instead of attenuation tanks. The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features should be provided at an early stage; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost. The detailed drainage strategy should deploy SuDS as source controls and to provide flow conveyance around the site.

Land Drainage Consent:

- 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](#)

Foul Drainage Strategy:

- The applicant must provide details of the foul water drainage network once confirmed by Thames Water.

Barney Taylor (AtkinsRéalis) working on behalf of Wiltshire Council Drainage.