



Technical note

From	Craddys	To	Wiltshire Council (C/o AtkinsRealis)
Date	18 th June 2026	Ref	13906w0002
Subject	Summary response to drainage comments reference PL/2026/01361 dated 03/04/2026		

The following technical note has been prepared for the purpose of summarising Craddys response to Wiltshire Council's comments on the Drainage Strategy in WC's (AtkinsRealis) capacity as LLFA. This technical note is to be read in conjunction with the Flood Risk Assessment and Drainage Strategy reference 13906w0001d.

	LLFA comment	Response
A	For the outline element of the application relating to the proposed drive-thru unit, no drainage strategy has been submitted.	Refer to section 8.5 and the Drainage Layout drawing in Appendix G4. (at page 97 of the DS PDF) now includes drainage strategy for the drive-thru unit.
B	Insufficient justification has been provided to confirm why discharge to the existing surface water sewer is necessary, given that in Section 7.10 of the Geo Environmental Appraisal identifies infiltration test with results ranging between 1.20×10^{-6} m/s and 1.40×10^{-5} m/s (noting that details have been omitted from the appendix).	Refer to section 8.3 of the Drainage Strategy. Infiltration is now Option A.
C	The proposed discharge rate does not align with Wiltshire Council's betterment policy. The controlled surface water discharge rate for the 1 in 1 year return period rainfall event should be as close as possible to greenfield rates and provide a minimum 30% reduction compared to the existing brownfield runoff rate.	Refer to section 8.5 of the Drainage Strategy. Attenuated discharge off site is now Option B. With a 95% reduction compared to existing brownfield runoff rates.
D	In accordance with Standard 2 of the National Standards for SuDS required interception storage calculations have not been submitted.	Infiltration is now Option A and therefore considered compliant.
E	Furthermore, the drainage plans lack clarity regarding network connectivity to the proposed attenuation tank, and inconsistencies in the drainage area used for attenuation sizing require clarification	Refer to updated Drainage Layout, catchment plan and Infodrainage calculations in Appendix G.
F	In addition, appendix 12 - Soil Percolation Testing Results is missing from the submitted Geo-Environmental Appraisal.	Now included in Appendix G1 (Pages 49 to 65 of the DS PDF).
1	To demonstrate compliance with the National Standards for Sustainable Drainage Systems, Standard 1, paragraph 1.2, the applicant must provide a clear and justification for not pursuing an	Disposal to ground is now Option A and in accordance with the





	infiltration-led surface water drainage strategy, despite on-site testing suggesting that the discharge of surface water via infiltration may be possible. To resolve this, - The applicant shall undertake BRE Digest 365-compliant infiltration testing to understand the impact of peak winter groundwater levels on infiltration rates. - The results of the winter testing shall be submitted alongside the results of the previously undertaken infiltration testing, which have not been provided within Appendix 12, in order to allow complete assessment of the site's infiltration potential.	drainage hierarchy.
2	The site is located within an area identified as being susceptible to groundwater flooding. The submitted borehole and infiltration testing was undertaken during July only and therefore does not represent worst-case seasonal groundwater conditions. If the site is located in an area susceptible to groundwater flooding. Therefore, in line with Wiltshire Council's Groundwater Management Strategy, the applicant is required to carry out a site-specific groundwater flood risk assessment that includes all available information and data from local sources such as historical records, parish councils, flood action groups and borehole records. In areas susceptible to groundwater flooding infiltration SuDS is not permitted unless it can be demonstrated to be appropriate. The groundwater assessment must include/consider the following: • Groundwater level monitoring (taking into account seasonal variations). • The interaction between different sources of flooding. • How groundwater will impact on the proposed drainage system. • The interaction between groundwater, groundwater recharge and aquifers. The applicant is referred to Wiltshire Council's Surface Water Soakaway Guidance for the standards that must be met for planning approval and adoption.	Refer to section 4.3 of the Drainage Strategy
3	Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.	Awaiting confirmation from Wessex Water on Option B.
4	The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS. The site layout should be updated to demonstrate the inclusion and arrangement of interception storage features.	Infiltration is now Option A and therefore considered compliant.
5	Tabulated comparison of pre-development greenfield rates, existing brownfield rates, and proposed post-development discharge rates. For more information refer to Wiltshire Council's betterment policy update which can be found here.	Refer to section 8.3 for pre-development greenfield run off rates and 8.5.2 of Drainage Strategy for a comparison of the pre and post-development runoff rates.





6	The surface water drainage strategy should demonstrate that: 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) or utility plant. - 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.	Refer to section 8.5 of Drainage Strategy and Infodrainage Calculations in Appendix G2 & G3 .
7	Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.	Refer to detail drawings in Appendix G4 (pages 99 to 100 of the DS PDF)
8	Pre and post development exceedance flow routing shall be provided to demonstrate that flood risk is not increased towards Horton Road or any other nearby site. The submitted details shall clearly demonstrate that exceedance flows are safely managed within the site boundary and discharged in a controlled manner that does not pose a flood risk to Horton Road	Refer to Appendix J of Drainage Strategy (pages 105 to 106 of the DS PDF)
9	A drainage strategy is required to support the outline applicant for the drive through unit and EV charging hub. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and National Technical Standards for SuDS.	Refer to section 8.5 and the Drainage Layout drawing in Appendix G4.

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