

To:	Samantha Stockley	From:	Drainage Team
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Planning App Ref:	PL/2026/04286
Service Ref:	Drainage
Date:	06/08/2026

PROPOSAL

Discharge of Conditions 5 (Surface water drainage strategy) for PL/2025/06794 - Subdivision of garden ground and erection of new dwelling

SITE LOCATION

Pear Tree House, Manor Orchard, Cricklade, Swindon, SN6 6EA

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Existing Site Drainage Plan
- Proposed Site Drainage Plan
- Revised Existing Site and Location Plan
- Surface Water Drainage Strategy

ASSESSMENT OF THE PROPOSAL

Context

In 2026 The LLFA had the following conditions for which information was required before these could be discharged:

Condition 5. No development shall commence until a detailed surface water drainage strategy for the site has been submitted to and approved in writing by the Local Planning Authority. The strategy shall be designed in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (SuDS), the National Standards for SuDS, the NPPF and Wiltshire Council requirements, and shall include details of discharge rates, storage volumes and long-term management. The approved scheme shall be implemented in full prior to first occupation of the dwelling and shall thereafter be retained and maintained as approved.

REASON: To ensure that surface water is managed in a sustainable manner and to prevent an increase in flood risk, in accordance with Core Policy 67 of the Wiltshire Core Strategy and the National Planning Policy Framework.

Assessment

As outlined in the Surface Water Drainage Strategy, infiltration is unlikely to be a viable drainage solution for the site, as trial holes undertaken during the 2003 construction works confirmed the presence of clay subsoil. The applicant is currently proposing a solution that involves all surface water captured on the building rooftop being discharged directly to an existing culvert to the east of the site. However, the applicant has stated that they intent to carry out further infiltration testing on site and would implement an infiltration-based strategy if infiltration rates supported this.

At this stage, the applicant is proposing to discharge surface water flows from the new building to the culvert at an unrestricted rate. This is not acceptable. We would expect the applicant to provide upstream storage, in the form of SuDS features, and to restrict the discharge rate based on Wiltshire Council's betterment policy for greenfield sites.

The applicant will also need to provide pre and post development exceedance routing plans demonstrate flood risk will not be increased elsewhere.

We would also expect the applicant to confirm that there will be no interruption to the existing land drainage arrangement due to the development.

RECOMMENDATION

Following a review of the information provided, Condition 5 cannot be discharged until the applicant provides supporting evidence to address the following requirements.

- Evidence that soakage tests have been undertaken in accordance with BRE 365. If infiltration is feasible, we would expect the applicant to submit the design of an infiltration based drainage strategy, supported by the provision of calculations that demonstrate that the soakaway has been designed for:
 - 1 in 10yr + cc flows (for individual properties)
 - Half drain time <24hrs
 - Appropriate factor of safety in line with CIRIA C753 (Table 25.2) guidance has been included.
 - Evidence that the highest groundwater level (taking into account seasonal variations) has been determined and this is at least 1m below the proposed bottom of any soakaway.

or

The applicant will be required to demonstrate that discharge rates are restricted in accordance with Wiltshire Council's betterment policy for greenfield sites. With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide **30% betterment** over pre development discharges for both peak flow and volume. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).

- 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.
- Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

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.
- 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.

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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.