

To:	Oliver Phippen	From:	Rahul Dixit
------------	----------------	--------------	-------------

Planning App Ref:	PL/2026/02134
Service Ref:	Drainage
Date:	24/08/2026

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	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Site Location Plan
- Design and Access Statement (July 2026)
- Flood Risk Assessment & Drainage Strategy (June 2026)

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 applicant has reconsulted with revised drainage strategy documents; however, the updated submission does not address all the conditions in the previous drainage response issued on 14/05/2026. The applicant must provide additional information to discharge all the condition.

The updated drainage information submitted by the applicant addresses the Council's previous requirements relating to the demarcation of surface water catchment boundaries and the demonstration of a 30% betterment against greenfield runoff rates. The revised Flood Risk Assessment (FRA) clearly identifies all surface water catchments draining the site, with catchment boundaries shown and consistent with the areas used within the greenfield runoff rate calculations.

The applicant has also provided further evidence to demonstrate compliance with the required runoff rate betterment. Table 5 within Chapter 5 of the Drainage Strategy confirms that a 30% betterment against greenfield runoff rates is achievable for all assessed storm events. Accordingly, the Council's previous drainage concerns in relation to catchment delineation and runoff rate betterment have been satisfactorily addressed.

It is also noted that the applicant has provided Causeway Flow modelling outputs and attenuation storage sizing calculations for the proposed attenuation basin and tanks. The submitted modelling demonstrates that the surface water drainage system has been designed to accommodate the 1 in 100-year return period storm event, including an allowance for climate change, without resulting in flooding.

It is also noted that the drainage strategy provides interception storage for at least the first 5mm of rainfall in accordance with SuDS standards. The proposed attenuation basins incorporate unlined areas with high-level overflows, enabling runoff from smaller rainfall events to be managed through infiltration and evapotranspiration, thereby reducing runoff volumes and supporting sustainable drainage objectives. However, groundwater monitoring information and confirmation of groundwater table levels should be provided to demonstrate that the performance of the proposed unlined features will not be adversely affected by groundwater conditions; this will need to be supported through long term groundwater monitoring throughout the winter period to establish seasonal variability.

The applicant has submitted pre- and post-development exceedance flow plans. However, the submitted information notes that site levels may change at the Reserved Matters stage as the layout is refined. Based on the current topography, exceedance flows are shown to route towards existing and proposed neighbouring development. However, a revised detailed post-development exceedance flow plan should be submitted at the Reserved Matters stage to demonstrate that exceedance flows from both proposed impermeable and permeable/green areas can be managed safely within the site, without increasing flood risk to the proposed development or neighbouring existing properties.

Consent or agreement for discharge to the receiving land drain will be required by the applicant to discharge into an existing drainage ditch.

RECOMMENDATION

No objection subject to the following conditions

1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

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

- Groundwater monitoring data and confirmation of groundwater levels, including monitoring throughout the winter period to establish seasonal variation, should be provided. The information should demonstrate that the maximum groundwater level remains at least 1.0 m below the base of any proposed basin and assess the potential impact of groundwater on the performance and operation of the proposed drainage system.
- The drainage drawings should show the pipe / link & manhole / node numbers used in the calculations to link the drawing with the detailed network hydraulic calculations.
- In accordance with Standard 1 of National Standards for SuDS, rainwater harvesting shall be considered in the detailed stormwater drainage scheme as stated in section 5.2 of FLOOD RISK ASSESSMENT & DRAINAGE STRATEGY- Issue 3.
- An interception storage plan demonstrating how the first 5mm of rainfall will be managed throughout the site in accordance with Standard S2 of the National Standards for Sustainable Drainage Systems (SuDS) Standard 2 - National standards for SuDS. This should identify the SuDS features providing interception storage and demonstrate how the requirement has been incorporated into the proposed drainage design.
- 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.
- 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.
- 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.