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Planning App Ref:	PL/2025/09192
Service Ref:	Drainage
Date:	23 January 2026

PROPOSAL

Outline planning permission: Some matters reserved

Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 210 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structures.

SITE LOCATION

Land at Penn Hill, Calne

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

- Covering Letter
- FRA and 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.

The site lies immediately north-east of Calne's built-up area and extends to around 15 ha. It is currently in agricultural use—mainly pasture—with a cluster of industrial units at its centre. An existing farmhouse also sits centrally but falls outside the application red line and will be retained with its current access. The site is visually well-contained, enclosed on all sides by mature hedgerows and trees.

The central industrial units host various light-industrial and automotive repair uses. They comprise a mix of single and two-storey brick and clad buildings on hardstanding used for vehicle and parts storage. These structures have no architectural merit and are visually contained by surrounding agricultural land, mature trees and hedgerows.

To the north and east, the site adjoins open agricultural fields, with further industrial uses beyond the north-east corner. Sand Pit Road forms the southern boundary, opposite recently built residential development forming the edge of Calne. Additional new housing lies at the south-east corner, while to the west the site borders a completed residential scheme, from which access from Oxford Road is provided.

The entire site is located within Flood Zone 1 'Low Probability' (land at less than 1 in 1,000 (0.1%) annual probability of river or sea flooding').

The majority of the site is located in an area with a 'Very Low' (land lower than 1 in 1000 (0.1%) annual probability) risk of flooding from surface water.

The WC Level 1 SFRA FRA data explorer shows that the majority of the site has a low risk of groundwater flooding.

Where the site is located away from the edge of the extent of the fluvial design flood, ground floor levels should be set a minimum of 150mm above the surrounding ground level to mitigate the residual flood risk from surface water runoff events. Surrounding ground levels should also be appropriately contoured to direct surface water away from houses.

The proposed surface water drainage strategy will manage the flood risk posed by uncontrolled surface water runoff from the site. Any increase in surface water run-off can be managed using SuDS source control techniques as well as attenuation features to provide storage in extreme storm events. This provides the required treatment stages in accordance with the recommendations of CIRIA C753.

All surface water drainage systems will be designed to restrict drainage discharge rates to QBAR runoff rates and store the balance of water for all events up to and including the 1 in 100-year event including an allowance for a 45% increase in rainfall intensities as a result of climate change and urban creep.

Assessment

The applicant has provided a drainage strategy from Section 6 of the submitted FRA. This has been reviewed and further details are required. We note that this strategy is based on assumption of impermeable area (unsurprising given the outline stage) however this therefore means that the detailed drainage strategy would still need to be developed as part of a subsequent planning stage. We do not believe that the current strategy demonstrates the required compliance with the National SuDS Standards and therefore additional information is required.

Surface water drainage for Catchments A, B and C currently drains directly into two attenuation basins with no source controls / interception features proposed. Two or more stages of SUDs are required to provide the required level of interception from the first 5mm of rainfall and to ensure water quality.

The strategy does not mention obtaining consents for discharge – Wiltshire Council issues land drainage consents for discharges to ordinary watercourses and for any works within 8m.

The drainage strategy plan is currently marked as 'indicative'. The LLFA requires that a detailed, final design drawing be supplied along with accompanying cross section drawings of the attenuation features

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:

The developer should provide the following information as part of future planning applications in accordance with the [National Standards for SuDS](#):

Standard 1: runoff destinations

- Evidence that the surface water disposal hierarchy has been applied and how all other options have been exhausted. For example, there is no mention of rainwater harvesting; given the scale of the residential development here there is ample opportunity for both individual property rainwater harvesting and communal rainwater harvesting to be explored.
- The centre of the site is stated to have sandstone geologies – additional investigation into how infiltration could be used in this area is required,
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Standard 2: interception

- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- SuDS source control measures to manage water quantity and maintain water quality will be implemented wherever possible, and throughout the management train, so the development is not reliant upon large attenuation features close to the points of discharge.
- Currently the applicant has not demonstrated how they will be intercepting the first 5mm from the full site.

Standard 3: management of extreme rainfall and flooding

- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- Exceedance routes that minimise the risks to people and property.
- Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at a sufficient height above the SW drainage cover levels.

Standard 4: water quality

- At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs). Catchments A and B are only served by one type.
- Calculations and supporting plans must be submitted to evidence compliance.

Standard 5: amenity

- The applicant must provide details of how SuDS features will deliver amenity benefits, including integration with public open space, accessibility, safety, and opportunities for recreation or education. Plans should clearly show how SuDS contribute to the quality and usability of the site for future occupants and the wider community. Note this may require additional engagement with the council's urban design and landscape officers.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks. A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- 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 including any lining to prevent ground water ingress.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.

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 out 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.