

To:	Jonathan James	From:	James Playfair
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Planning App Ref:	PL/2025/09192
Service Ref:	Drainage
Date:	25 June 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	
Support	
No comment	
No objection	X
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- FRA & Drainage Strategy Update PL.2023.07216

ASSESSMENT OF THE PROPOSAL

Context

In July 2026 the LLFA proposed a Holding Objection until the following information is supplied:

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

- Surface water drainage for Catchments A, B and C currently drains directly into two attenuation basins with no source controls / interception features proposed. 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.

Assessment

The applicant has provided a revised drainage strategy and this has been reviewed against our requirements as set out above.

Section 7.4.5. states: *For the purposes of this assessment, infiltration techniques will not be relied upon at outline stage, these techniques should be explored at later stages as a means to reduce site runoff volumes and basin sizes*

This review is based on a viable SW drainage strategy being presented without infiltration. It is noted that should testing indicate infiltration can be utilised it would only serve to reduced storage volumes of attenuation ponds. The LLFA would recommend installation of 'leaky' water butts or water butt planters

Standard 1

All private driveways will have permeable paving and swales, with check dams will be incorporated throughout. The LLFA would like to see a commitment to rainwater harvesting in the strategy as opposed to statements such as 'rainwater harvesting, should be considered' (Section 7.4.17) and 'rainwater harvesting may be incorporated at the property level' (Section 7.5.8). The incorporation of such should not be reliant on whether infiltration may be feasible in a small part of the catchment (Section 7.5.8)

Standard 2

Surface water from properties directed to Permeable paving on driveways and access roads. As part of the wider strategy, other SuDS components including swales and attenuation basins are proposed. This provides a degree of source control and interception however this is to be evidenced.

Standard 3

Exceedance flows may enter the site road network. The site levels will be designed to accommodate these flows, such that runoff from the majority of the site will be conveyed by gravity towards the final attenuation basin.

Surface water depths within the road network will be controlled to a maximum of 300mm, and exceedance routing will ensure that no flooding of buildings occurs. Flow pathways will follow the natural topography of the site

Standard 4

Residential areas: low pollution hazard → treated at source

Main access roads: medium hazard → require multi-stage treatment via swales and attenuation.

Pollution calculations have been supplied and before the design phase is concluded, the proposals will be reviewed and analysed in order to identify potential shortcomings and to ensure that an adequate volume of SuDS features is provided to mitigate the risk of pollution from each source

Standard 6

The proposed SuDS strategy has been developed to ensure that drainage features contribute positively to the amenity and biodiversity of the site, in accordance with the principles of the SuDS. It is highlighted that others within the council may wish to comment on this and our comments do not prejudice their consultee responses or the council's position

Standard 7

A detailed separate adoption and maintenance regime for SuDS will be submitted in support of the Reserved Matters application

The drainage strategy demonstrates compliance with National SuDS Standards by:

- Restricting runoff to **greenfield-equivalent rates**
- Implementing **source control and interception** for frequent rainfall
- Providing **sufficient attenuation and exceedance routing** for extreme events
- Delivering **robust water quality treatment** through a SuDS treatment train

Further refinement (including infiltration testing, treatment verification, and maintenance strategy) will be undertaken at detailed design stage.

RECOMMENDATION

No objection subject to the following conditions

- The LLFA would like to see a commitment to rainwater harvesting in the strategy and demonstrate the implantation during the next stage,
- The applicant is to demonstrate to that the first 5mm interception has been achieved by either applying a 5 mm rainfall depth deduction to your source control calculations or use approved hydraulic models to demonstrate evapotranspiration and infiltration.

These can be demonstrated during the Full application submission