

To: Development Management

From: Drainage Team Rohit Singh

Planning App Ref: PL/2026/03392

Service Ref: LLFA

Date: 22/06/2026

PROPOSAL

Proposed erection of a new farm shop and cafe with associated access, car parking, service yard, drainage pond and landscaping

SITE LOCATION

Land south of Atcherley Road, Calne, SN11 8QJ

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

- Cover Letter
- Drainage Strategy
- Flood Risk Assessment
- Location Plan
- Planning Statement

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.

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

1. Flood Risk Assessment Compliance

The submitted Flood Risk Assessment demonstrates that the majority of the site lies within Flood Zone 1, with built development located outside higher risk Flood Zones 2 and 3. The assessment considers multiple sources of flood risk including fluvial, pluvial, groundwater and artificial sources, aligning with national planning guidance. The classification of the proposed development as 'less vulnerable' is appropriate for the identified flood context and supports development suitability in principle.

However, the Flood Risk Assessment does not provide sufficient detailed evidence required at full application stage. There is no site-specific modelling to verify flood levels, limited justification of finished floor levels, and no detailed demonstration of how the development remains safe during extreme events. The assessment also fails to integrate robustly with the drainage strategy, limiting confidence that flood risks will be effectively managed over the lifetime of the development.

2. Surface Water Drainage Strategy (Hydraulic Performance)

The drainage strategy proposes a sustainable approach including attenuation through a surface water pond, permeable paving systems and flow control structures, with discharge restricted to a greenfield runoff rate of 2.8 l/s. This approach reflects standard practice for controlling post-development flows and demonstrates an intention to minimise downstream flood risk. The identification of SuDS features indicates that surface water management has been considered comprehensively in principle.

Notwithstanding this, the application fails to provide the detailed hydraulic calculations required at full stage to demonstrate compliance with design standards. There is no evidence of modelling for the 1 in 30 year and 1 in 100

year plus climate change events, no confirmation of storage volumes, and no verification that the system will prevent on-site flooding. As such, the performance of the proposed drainage system cannot be validated.

3. Drainage Hierarchy and Infiltration

The drainage strategy acknowledges the drainage hierarchy and identifies that infiltration may be constrained due to clay geology and low permeability soils. This demonstrates an understanding of site conditions and an attempt to consider appropriate disposal routes in accordance with SuDS principles.

However, the application fails to demonstrate compliance with the drainage hierarchy, as infiltration has been dismissed without site-specific testing in accordance with BRE365. At full application stage, this represents a significant deficiency, as higher-order drainage options have not been robustly assessed. The absence of infiltration testing undermines confidence that the proposed discharge strategy is justified.

4. Discharge Strategy and Downstream Impact

The proposed discharge to River's Brook represents a logical outfall given its proximity to the site and aligns with the drainage hierarchy where infiltration is not feasible. The use of flow control devices to limit discharge suggests that the development seeks to avoid increasing downstream flood risk in principle.

However, no evidence has been provided to demonstrate that the receiving watercourse has sufficient capacity to accommodate the proposed flows. There is no hydraulic assessment of downstream impacts, no outfall design detail, and no confirmation of discharge constraints or agreements. This represents a failure to demonstrate that the development will not increase flood risk elsewhere.

5. Exceedance Flow Management and Residual Risk

The Flood Risk Assessment identifies that surface water flood risk across the site is generally low and that the main development areas avoid low-lying flood-prone zones. This provides a degree of confidence that baseline flood risk constraints have influenced the site layout.

However, the application does not demonstrate how exceedance flows will be safely managed during extreme events or system failures. No exceedance routing plans, flow paths, or residual risk assessments have been provided. This is a fundamental requirement at full stage and represents a significant gap, as the safe management of exceedance flows is critical to ensuring development safety.

6. SuDS Design and Interception

The inclusion of SuDS features such as permeable paving, a surface water pond and flow control structures provides a foundation for managing runoff quantity and quality. The identification of treatment processes indicates that water quality considerations have been recognised.

Despite this, the application fails to demonstrate compliance with interception requirements or to present a clear SuDS treatment train. There are no calculations confirming capture of the first 5mm of rainfall, and the design appears to rely heavily on downstream attenuation. This represents a shortfall

in meeting modern SuDS standards and limits the effectiveness of the proposed system.

7. Maintenance and Deliverability

A maintenance schedule has been provided which outlines routine inspection and upkeep activities for the drainage system. This demonstrates awareness of the need for long-term management to ensure the continued functioning of SuDS features.

However, the application does not clearly define the ownership, management responsibilities, or funding arrangements for the drainage infrastructure. There is also no confirmation of adoption or legal agreements for discharge routes. At full application stage, this lack of detail introduces uncertainty regarding the long-term deliverability and performance of the drainage system.

RECOMMENDATION

Holding objection as further information required

The Lead Local Flood Authority (LLFA) has reviewed the submitted Flood Risk Assessment (FRA) and Surface Water Drainage Strategy. Whilst the submission demonstrates an understanding of high-level flood risk and drainage principles, it does not provide sufficient detailed technical evidence required at full application stage.

Furthermore, the presence of **known downstream flooding within the receiving watercourse (River's Brook)** introduces an additional constraint which has not been addressed within the drainage strategy.

Accordingly, the LLFA raises a **holding objection** pending submission of the following information:

Required Information

- 1. Site-Specific Hydraulic Modelling and Flood Level Verification**

The FRA does not include detailed modelling or robust verification of flood levels across the site. Site-specific modelling is required to confirm the extent, depth, and level of flooding during the 1 in 100 year plus climate change event, and to ensure that development is located and designed appropriately in relation to flood risk.

- 2. Finished Floor Level (FFL) Strategy**

No clear justification for finished floor levels has been provided. Detailed plans and cross-sections are required to demonstrate that FFLs are set above design flood levels with an appropriate allowance for freeboard, ensuring the safety of buildings over the lifetime of the development.

- 3. Integrated Flood Risk and Drainage Strategy**

The FRA and drainage strategy have not been sufficiently integrated. A coordinated approach is required to demonstrate how the management of flood risk and surface water runoff operates together across all events, including the interaction between storage, exceedance, and site levels.

4. **Detailed Surface Water Drainage Calculations**
The submission lacks hydraulic modelling outputs for the 1 in 30 year and 1 in 100 year plus climate change events. Full calculations are required to demonstrate that the drainage system has been designed in accordance with standards and that no on-site flooding will occur during the design events.
5. **Attenuation Storage Design and Volume Calculations**
Insufficient evidence has been provided to confirm that the proposed attenuation features can accommodate runoff volumes for critical storm events. Detailed storage calculations and design information are required to verify system capacity.
6. **Infiltration Testing (BRE365 Compliant)**
Infiltration has been discounted without supporting site-specific evidence. Testing in accordance with BRE365 is required to confirm ground conditions and determine whether infiltration-based solutions are feasible, as required by the drainage hierarchy.
7. **Drainage Hierarchy Justification**
In the absence of infiltration evidence, the application does not demonstrate compliance with the drainage hierarchy. A clear, evidence-based justification is required to explain why higher-order discharge options are not viable before relying on discharge to a watercourse.
8. **Outfall Design Details**
No detailed information has been provided regarding the design of the outfall. Drawings, levels, and headwall details are required to demonstrate that the discharge can be achieved safely and without causing erosion, blockage, or operational issues.
9. **Receiving Watercourse Capacity Assessment**
There is no evidence to demonstrate that River's Brook has sufficient capacity to accept the proposed discharge. An assessment is required to confirm that the receiving system will not be overwhelmed as a result of the development.
10. **Downstream Impact Assessment**
The application does not demonstrate that the discharge will not increase flood risk elsewhere. Hydraulic evidence is required to confirm that there will be no adverse impacts on downstream receptors.
11. **Exceedance Flow Routing Plan**
No information has been provided on the management of exceedance flows. A plan is required to demonstrate how runoff exceeding the design capacity of the drainage system will be directed safely through the site without impacting buildings, infrastructure, or third-party land.
12. **Residual Risk Assessment**
The submission does not consider system failure scenarios, such as blockage of flow controls or exceedance events. A residual risk assessment is required to demonstrate that such scenarios will be managed safely.
13. **SuDS Strategy and Treatment Train**
While SuDS features are proposed, the application does not clearly demonstrate a treatment train in accordance with best practice. A detailed SuDS strategy is required showing how water quality, quantity,

and amenity/biodiversity benefits are achieved through a staged approach.

14. Interception Storage Calculations (First 5mm Capture)

The application does not demonstrate compliance with interception principles. Calculations are required to confirm that the first 5mm of rainfall is captured and managed at source, in line with modern SuDS standards.

15. Detailed Drainage Layout Plans

The drainage proposals are currently indicative. Detailed layout drawings are required, including pipe networks, manholes, levels, control structures, and exceedance flow routes to allow a full technical review.

16. Maintenance and Management Plan

Although a high-level maintenance schedule has been provided, further detail is required. This should include maintenance activities, inspection frequencies, and access requirements to ensure long-term system performance.

17. Ownership and Adoption Arrangements

The application does not define who will be responsible for the long-term management of the drainage infrastructure. Confirmation of ownership, adoption routes, and funding mechanisms is required to ensure the system is deliverable and maintainable.

18. Discharge Consents and Legal Agreements

No evidence has been provided to confirm that discharge to River's Brook is agreed in principle. Appropriate consents and legal agreements must be demonstrated.

19. Downstream Flooding Constraint and On-Site Betterment Strategy

Given the presence of known flooding within River's Brook, the drainage strategy must go beyond demonstrating neutrality. The application must show how the development responds to this constraint by:

- incorporating landscape areas and open space to provide additional storage and exceedance capacity,
- ensuring that exceedance flows are contained and managed within the site boundary,
- considering opportunities to reduce discharge rates or increase attenuation volumes beyond minimum requirements, and
- demonstrating that the scheme will not exacerbate, and where reasonably practicable may contribute to alleviating, downstream flooding.

At present, this critical aspect has not been addressed, and therefore the suitability of the proposed discharge strategy cannot be confirmed.

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:

Consultation not required

Drainage consultation is not required for this application as it falls below the threshold set out in the drainage consultation matrix. No further comments are necessary.

Informatives

threshold set out in the drainage consultation matrix. No further comments are necessary.

1. Early Engagement with LLFA

The applicant is advised to engage with the Lead Local Flood Authority at an early stage when preparing the revised drainage strategy to ensure that the scope and methodology of any additional work aligns with local requirements and avoids delays in determination.

2. Climate Change Allowances

The drainage design should incorporate the latest Environment Agency climate change allowances appropriate to the development vulnerability, flood zone, and lifetime of the development.

3. SuDS Design Guidance

The applicant is encouraged to design the drainage system in accordance with the CIRIA SuDS Manual (C753), ensuring that the scheme delivers multiple benefits including water quantity control, water quality improvement, biodiversity enhancement, and amenity value.

4. Betterment and Green Infrastructure

Given the presence of downstream flood risk, opportunities should be explored to exceed minimum policy requirements by incorporating additional storage and multifunctional green infrastructure within landscape areas to provide betterment where feasible.

5. Exceedance and Overland Flow Design

Exceedance flow routes should be carefully designed to follow natural topography and be integrated into external spaces such as roads, swales, and landscaped areas, ensuring safe conveyance without impacting properties.

6. Maintenance Considerations

SuDS features should be designed with long-term maintenance in mind, including safe access, ease of inspection, and clearly defined responsibilities to ensure continued performance over the lifetime of the development.

7. Consents and Third-Party Agreements

The applicant is reminded that separate consents may be required for works affecting ordinary watercourses, and that permission from relevant landowners or authorities will be required for any discharge connections.