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Planning App Ref:	PL/2026/04365
Service Ref:	Drainage
Date:	28/08/2026

PROPOSAL

Full planning permission

The construction of a new 60 bed Care Home with associated landscaping and car parking facilities on the former site of the Co-op store accessed from Mill Street. The development also includes 7 Assisted Living units to the north on the former car park accessed from The Pippen. Both sites are linked by existing pedestrian bridges across the River Marden. The demolition of the Co-op store has been approved under a separate application (PL/2025/02050).

SITE LOCATION

Co-operative Food, Mill Street, Calne, SN11 0HT

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

- Application Form
- Design and Access Statement
- Flood Risk Assessment & Drainage Strategy (Part 1 of 2)
- Flood Risk Assessment & Drainage Strategy (Part 2 of 2)
- Location Plan
- Planning Statement
- Proposed Site Plan

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 application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

The LLFA's assessment relates to flood risk, water quantity, water quality and maintenance considerations. The proposed SuDS may also have implications for biodiversity, amenity, landscape, green infrastructure and placemaking objectives. Assessment of these matters falls outside the remit of the LLFA. The Local Planning Authority should seek and have regard to the advice of Wiltshire Council's Ecology, Landscape, urban design and other relevant specialist teams when considering these aspects of the proposal.

The Flood Risk Assessment should be updated to refer to the current National Planning Policy Framework (NPPF), published on 17 August 2026, and demonstrate that the proposed development complies with the requirements of the updated NPPF.

The applicant should engage with the Local Planning Authority to confirm the extent of the Sequential Test required and demonstrate that there are no other reasonably available sites at a lower risk of flooding.

Further detail is required on the proposed mitigation measures for managing fluvial flood risk. While finished floor levels are proposed to be raised above predicted flood levels, the applicant should demonstrate how the development and its occupants will remain safe throughout the lifetime of the development, taking account of residual flood risk.

The applicant should provide further information regarding the existing drainage network serving the site, including its condition, capacity and connectivity, together with clear justification as to why the existing system cannot be retained and incorporated within the proposed drainage strategy.

The emergency access and egress assessment should be supported by more detailed flood modelling. In particular, additional information is required to demonstrate how flood levels and flood hazards interact with the proposed escape route, including the bridges crossing the Main River, to confirm that a safe route remains available during flood events.

The applicant is required to consider rainwater harvesting for the care home, as water reuse measures are currently only proposed for the assisted living dwellings, to demonstrate compliance with Standard 1 of [National Standards for SuDS](#).

As the drainage system discharges to a watercourse potentially affected by elevated flood levels, evidence should be provided that a sensitivity assessment has been undertaken using surcharged outfall conditions to demonstrate the drainage system remains effective during flood

events. The applicant shall also provide evidence of agreement in principle from the Environment Agency and confirmation that the existing outfalls are suitable for continued use.

Whilst attenuation volume calculations have been provided for the proposed attenuation tank and permeable paving system, the submission does not include hydraulic calculations for the wider drainage network. Detailed modelling results for all proposed pipes, manholes and other drainage components should be provided to demonstrate that the network has sufficient hydraulic capacity and functions as intended during the 1 in 30 year and 1 in 100 year plus climate change rainfall events.

No cross-sections or standard detail drawings have been submitted for the proposed SuDS 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 applicant should engage with the Local Planning Authority to confirm the extent of the Sequential Test required and demonstrate that there are no other reasonably available sites at a lower risk of flooding.
- The applicant should consider rainwater harvesting for the care home to demonstrate compliance with Standard 1 of the National Standards for SuDS.
- Evidence that the strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- A clearly labelled drainage layout plan showing the pipe networks and all pipe node and link numbers referred to within the drainage calculations is to be submitted.
- The surface water drainage strategy should demonstrate that:
 - The 1 in 30 year rainfall event is contained within the drainage system without causing flooding to any part of the site.
 - The 1 in 100 year plus climate change rainfall event does not cause flooding to any building (including a basement) or utility plant.
- The applicant shall submit a manhole / inspection chamber schedule to include cover and invert levels.
- Cross sections and standard detail drawings should be provided for the permeable paving, raingarden and attenuation tank and their components.
- The applicant should provide further details of the proposed fluvial flood risk mitigation measures and demonstrate how the development will remain safe during flood events.
- The applicant should provide more detailed modelling of the emergency access and egress route, including the interaction of flood levels and hazards with the bridges crossing the Main River, to demonstrate that a safe escape route is available during flood events.
- Evidence that consent for outfalls from the proposed drainage system into the watercourse has been obtained from the Environment Agency.
- Evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.
- The applicant is proposing drainage features in areas already at risk of flooding. In accordance with Standard 3 of the National Guidance for SuDS, the applicant must demonstrate that these features have been designed to contain both flood water and required attenuation combined up to and including volumes arising from the 100 year + climate change event, and that these features can operate under flood conditions.
- Evidence that an allowance for reduced attenuation volume due to silt ingress is considered for the attenuation tank (as per Section 21.9.9 of the SuDS Manual CIRIA C753).
- Evidence that adequate measures will be taken during construction to control pollution to existing watercourses and groundwater.

The drainage team have the following conditions which need to be addressed by the applicant prior to occupation:

As-Built SuDS and Watercourse/Ditch Modification Drawings (AutoCAD Format)

No later than 3 months following completion of the SuDS infrastructure and any associated watercourse or ditch modifications, and in any event prior to the first occupation of any dwelling (or first use of the development, whichever is sooner), the developer shall submit to and obtain written approval from the Local Planning Authority, in consultation with the Lead Local Flood Authority, the following as-built information:

1. As-built SuDS construction drawings, including all attenuation basins, flow controls, pipe networks, swales, inlets/outlets, exceedance routing and all constructed drainage assets.
2. As-built plans of all watercourse, ditch or land-drain modifications, including dimensions, levels, cross-sections, long-sections and construction details.
3. All as-built SuDS and watercourse/ditch drawings shall be provided in:
 - AutoCAD (DWG) format, fully georeferenced to OS National Grid; and
 - PDF format for record purposes.
4. A full drainage asset schedule including dimensions, levels, materials, and long-term maintenance responsibilities.
5. An updated SuDS Maintenance Plan reflecting the final as-built arrangement.

The approved as-built drawings and documentation shall thereafter form the definitive drainage record for the development and must be complied with for the lifetime of the drainage system.

Reason:

To ensure the constructed drainage system and watercourse/ditch modifications accord with the approved design, to maintain accurate LLFA drainage records, and to ensure the development does not increase flood risk on- or off-site, in accordance with the NPPF and Wiltshire Council SuDS guidance.

INFORMATIVES

- 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.
- An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

The Environment Agency issues environmental permits, however, as Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, **the discharge rate from the site must be agreed with Wiltshire Council** as part of agreeing the surface water drainage strategy for the site.
- The applicant should note that if the intention is to offer the roads for adoption, the LLFA does not provide for the approval of drainage suitable for adoption by the Highway Authority. Further approval should be ascertained from the Highway Authority.

To find out more about the processes required to secure road adoption, contact the Highway Authority at HighwaysDevelopment@wiltshire.gov.uk
- For phased developments the applicant shall provide a phased management plan to demonstrate how the surface water drainage design will operate during each phase of construction. This should include detail on how flow control (satisfying standard 3) will be managed across the phases.

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.