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Planning App Ref:	PL/2025/09284
Service Ref:	Drainage
Date:	29/12/2025

PROPOSAL

Full application for removal of storage area for proposed Agricultural storage building and Padel Court use.

SITE LOCATION

Lower Farm, Devizes Road, Rowde, Devizes, SN10 2LX

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
- Location Plan
- Existing Block-Roof Plan
- Proposed Block-Roof Plan
- Proposed Elevations
- Proposed 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

According to the SFRA, the proposed site is in Flood Zone 1. However the site is subject to high risk of surface water flooding. Also, the access road is subjected to surface water flooding for 1 in 30 year rainfall event, so access/egress may be an issue.

This application is to demolish the existing storage structure for erection of new proposed Agricultural storage building and Padel Court use. The total area of the site is 0.07 hectares, and the proposal will increase the floorspace by 598 sq. m.

The applicant has proposed to manage storm water by discharging it into an existing watercourse. However, in accordance with the SuDS hierarchy as per National Standards (2025), source-control options such as rainwater harvesting (RWH) and interception of the first 5 mm of rainfall must be prioritised before discharge to a watercourse. If these measures are deemed unsuitable, the applicant must provide a clear, evidence-based justification

No drainage strategy details are submitted with this application. A drainage strategy, along with an emergency plan, are required to support this application. The surface water drainage strategy should be in accordance with the Wiltshire Council requirements, NPPF, PPG, and the [National Standards for SuDS](#).

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, National Standards for SuDS and 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:

A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and Non Statutory Technical Standards for SuDS.

- Evidence that the surface water disposal hierarchy has been applied.
- A detailed plan including layout and cross-sectional drawings of the proposed drainage scheme and all associated SuDS features (if proposed) shall be submitted.
- Pre and post development discharge rates. With regards the control of surface water discharges from brownfield sites, Wiltshire Council requires post development discharges to be as close as reasonably practicable to greenfield runoff for both peak flow and volume. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).
- Pre and post development exceedance routing that demonstrates flood risk is not increased elsewhere.
- Evidence that the finished floor levels are above the maximum predicted 100-year flood level or if no flooding is predicted, at 150 mm height above the SW drainage cover levels.
- 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.

- Access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).

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.
- 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 sets 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.