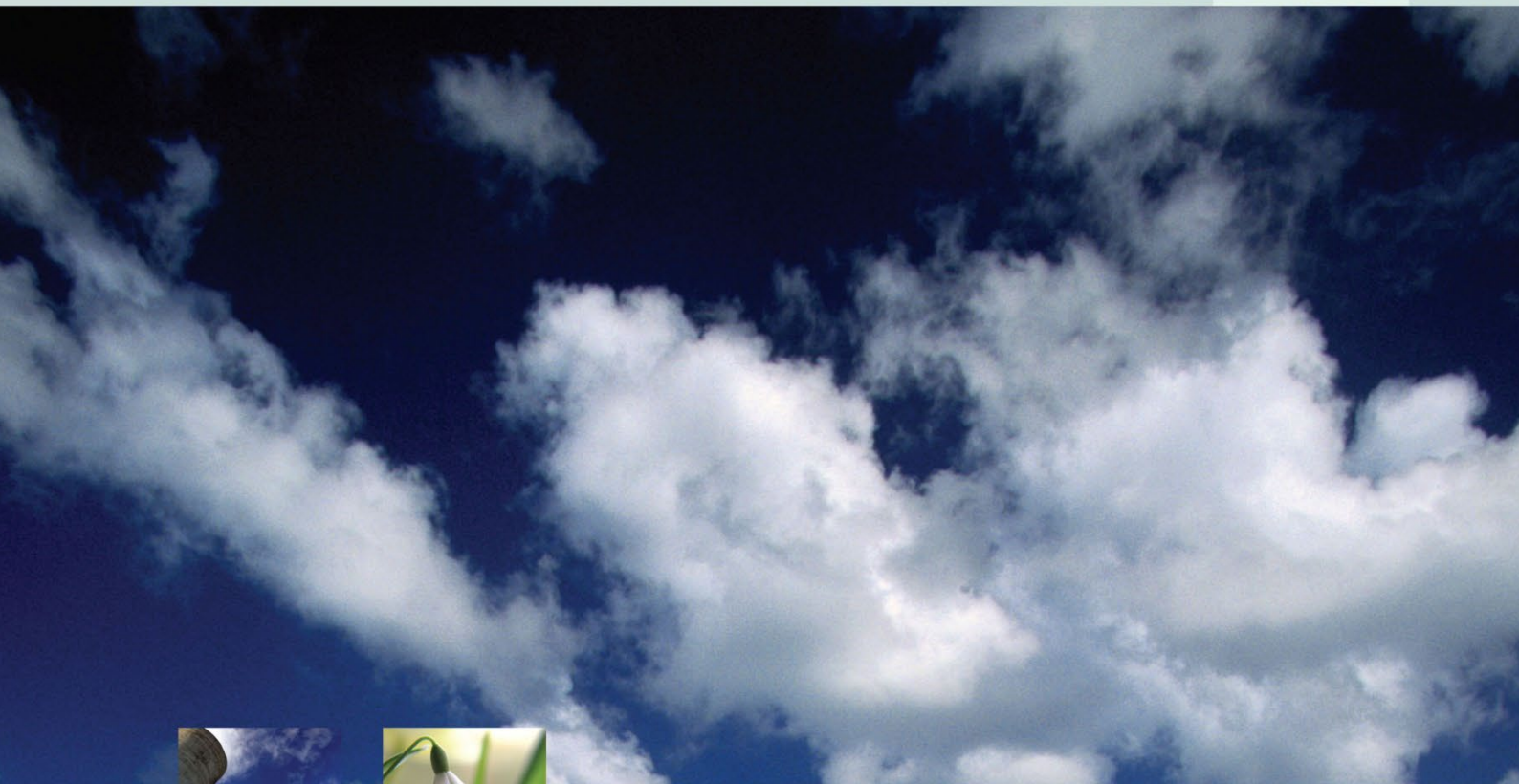




Sustainability Statement

Land at
London Road, Devizes, SN10 2JG

Prepared for:

Highgrove Group (Reading) Limited on behalf of PRZM Real Estate and Aldi Stores Ltd.

Date:
February, 2026

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1. INTRODUCTION

1.1 Background

Sol Environment Ltd ('Sol' hereafter) were engaged by Highgrove Group (Reading) Limited on behalf of PRZM Real Estate and Aldi Stores Ltd ('the Applicant' hereafter) to undertake a sustainability assessment and produce a Sustainability Statement for the proposed new Aldi Foodstore with associated car parking, access, and landscaping on land occupied by a motorcycle training centre and several small buildings, at London Road, Devizes, which shall be applied for in full detail, as well as the erection of a Drive Thru and EV hub, which shall be applied for in outline (all matters reserved except for access).

This report has been prepared by Sol Environment Ltd in cooperation with the Applicant and in accordance with the following policies and guidance:

1.1.1 Wiltshire Council -Wiltshire Core Strategy (Adopted January 2015)

- Wiltshire Council – The Wiltshire Core Strategy (Adopted January 20th, 2015) referring specifically to the following policies:
 - Core Policy 41: Sustainable construction and low carbon energy
 - Core Policy 50: Biodiversity & Geodiversity
 - Core Policy 51: Landscape
 - Core Policy 52: Green Infrastructure
 - Core Policy 55: Air Quality
 - Core Policy 56: Contaminated Land
 - Core Policy 57: Ensuring High-Quality Design & Place-Shaping
 - Core Policy 61: Transport & New Development
 - Core Policy 62: Development Impacts on the Transport Network
 - Core Policy 67: Flood Risk
 - Core Policy 68: Water Resources

This report has been prepared in association with a new full planning application for the development.

In addition to the adopted Local Plan and associated Policies, due consideration has also been given to the Wiltshire Design Guide SPD (2024) and Devizes Area Neighbourhood Plan (July 2015) issued by the Wiltshire Council, and the Wiltshire Local Plan. The applicant has had regard to their guidance in interpreting and applying current policies, ensuring the proposals align with both statutory planning requirements and local supplementary direction.

1.2 Proposed Development

The proposed retail development comprises the construction of a new Aldi Foodstore including car parking, access, and landscaping works which shall be applied for in full detail, as well as the erection of a Drive Thru and EV hub, which shall be applied for in outline (all matters reserved except for access).

A site plan showing the proposed development is provided in Figure 1.1 on the following page:

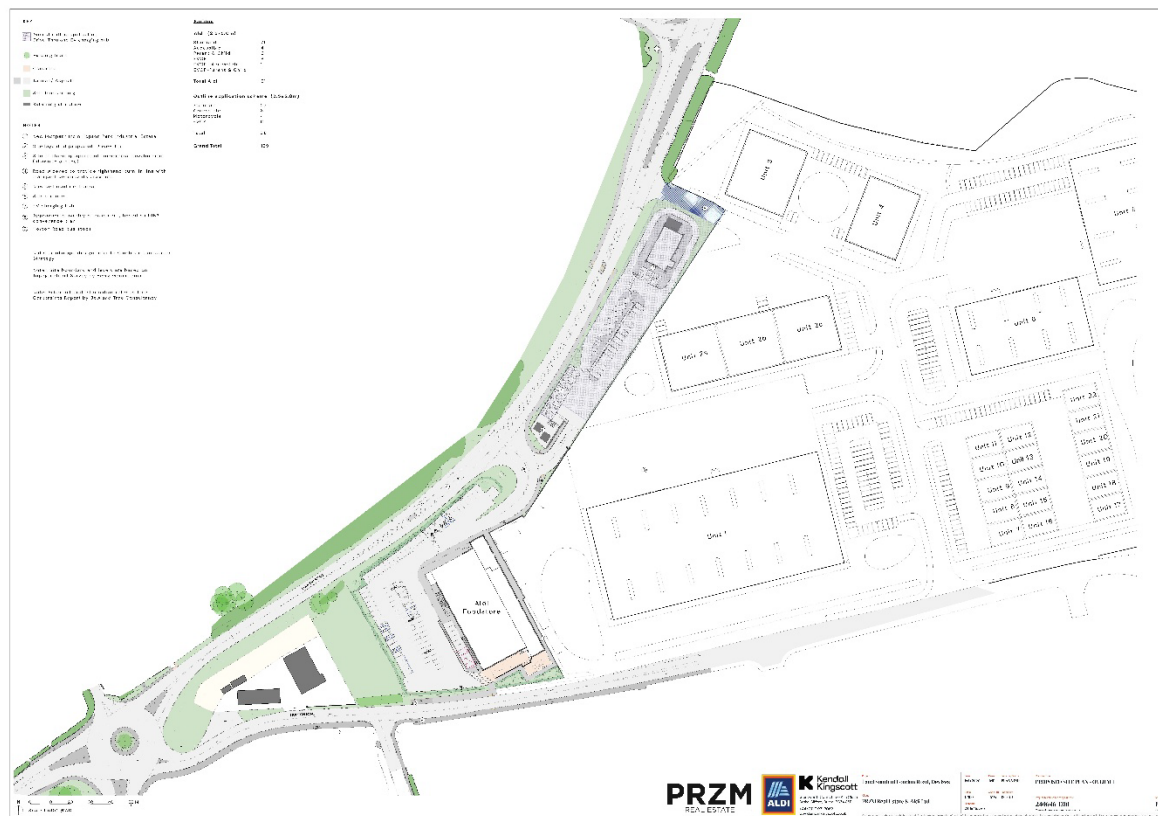


Fig 1.1: Proposed Site Plan prepared by Kendall Kingscott.

2. PLANNING POLICY

There are a number of international and national policy drivers for sustainability, increased energy efficiency and reduced Carbon Dioxide (CO₂) emissions, which have been introduced to address the issue of global warming and the implications of climate change. On an international level this includes the Kyoto Protocol, to which the UK government has made a commitment and developed national policies such as the Energy White Paper and the NPPF.

At the local level, the current Local Plan in particular remains a material consideration. These policies and documents are described in further detail within the section below.

2.1 National Policy

2.1.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are expected to be applied. It sets out a framework that aims to achieve sustainable development throughout the planning system with three overarching objectives – economic, social and environmental.

At the heart of the NPPF is a 'presumption in favour of sustainable development', which requires Local Authorities as part of any plan-making or decision-making, to provide clear guidance on how the presumption should be applied locally.

The NPPF sets out how to deliver sustainable development under 17 subheadings. Subheading 14 of the NPPF outlines how the planning system should support the transition to a low carbon future in a changing climate, taking full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

2.2 Local Policy

2.2.1 Wiltshire Council -Wiltshire Core Strategy (Adopted January 2015)

The following policies are relevant to the proposed sustainability criteria of the development:

CP41: Sustainable construction and low-carbon energy

1. Climate change adaptation

New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer.

2. Sustainable construction

New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes.

Conversions of property to residential use will not be permitted unless BREEAM's Homes 'Very Good' standards are achieved.

All non-residential development will be required to achieve the relevant BREEAM 'Very Good' standards, rising to the relevant BREEAM 'Excellent' standards from 2019.

3. Existing buildings

Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy:

- i) Reduce energy consumption through energy efficiency measures
- ii) Use renewable or low-carbon energy from a local/district source
- iii) Use building-integrated renewable or low-carbon technologies.

Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement.

4. Renewable and low-carbon energy

All proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal.

In all cases, including those listed above, proposals relating to historic buildings, listed buildings and buildings within conservation areas and world heritage sites should ensure that appropriate sensitive approaches and materials are used. Safeguarding of the significance of heritage assets should be in accordance with appropriate national policy and established best practice.

In all cases the impact of these requirements on the viability of development will be taken into consideration.

CP50: Biodiversity and Geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats through the lifetime of the development.

Any development affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats,

ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i) Cannot reasonably be avoided
- ii) Are reduced as far as possible
- iii) Are outweighed by other planning considerations in the public interest
- iv) Where appropriate compensation measures can be secured through planning obligations or agreements

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

CP51: Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i) The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.
- ii) The locally distinctive character of settlements and their landscape settings.
- iii) The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- iv) Visually sensitive skylines, soils, geological and topographical features.
- v) Landscape features of cultural, historic and heritage value.
- vi) Important views and visual amenity.
- vii) Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.
- viii) Landscape functions including places to live, work, relax and recreate.
- ix) Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

CP52: Green infrastructure

Development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

- i) Retain and enhance existing on site green infrastructure
- ii) Make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards
- iii) Put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development
- iv) Provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy
- v) Identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.

Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.

CP55: Air quality

Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:

- i) Landscaping, bunding or separation to increase distance from highways and junctions
- ii) Possible traffic management or highway improvements to be agreed with the local authority
- iii) Abatement technology and incorporating site layout/separation and other conditions in site planning
- iv) Traffic routing, site management, site layout and phasing
- v) Where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants.

CP56: Contaminated land

Development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity.

Developers will be required to demonstrate that the development site is, or will be, made suitable for the proposed final use and will need to provide one or more of the following documents:

- i) Detailed site history identifying possible contaminative uses.
- ii) Site characterisation: The nature and extent of any contamination and the hazards and risks posed.
- iii) Detailed remediation scheme: Including methodology and quality assurance.
- iv) Methodology to report unexpected contamination.
- v) Methodology to ensure verification of remedial works.
- vi) Details of long-term monitoring and maintenance proposals (where necessary).

The need for, type and complexity of reports will depend on the specific site.

CP57: Ensuring high-quality design and place-shaping

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will 285 make a positive contribution to the character of Wiltshire through:

- i) Enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced.
- ii) The retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii) Responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.
- iv) Being sympathetic to and conserving historic buildings and historic landscapes
- v) The maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)
- vi) Making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii) having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the

- development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- viii) Incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
 - ix) Ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
 - x) The sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
 - xi) Taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long-term future
 - xii) The use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
 - xiii) The case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place
 - xiv) Meeting the requirements of Core Policy 61 (transport and new development).

CP61: Transport and new development

New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.

As part of a required transport assessment, the following must be demonstrated:

- i) That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:
 - a) Visually impaired and other disabled people
 - b) Pedestrians
 - c) Cyclists
 - d) Public transport
 - e) Goods vehicles
 - f) Powered two-wheelers
 - g) Private cars.
- ii) That the proposal is capable of being served by safe access to the highway network.
- iii) That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.

Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.

CP62: Development impacts on the transport network

Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operation stages.

Proposals for new development should not be accessed directly from the national primary route network outside built up areas unless an over-riding need can be demonstrated.

CP67: Flood risk

Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.

All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

CP68: Water resources

Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible.

Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals.

Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and demonstrate that these would be protected throughout the construction and operational phases of development.

2.2.2 Wiltshire Council -Wiltshire Core Strategy (Adopted January 2015)

WCS5: The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management

In the interest of sustainable waste management, the Councils will seek to drive waste up the hierarchy by ensuring that developers demonstrate that the most sustainable option for waste management in Wiltshire and Swindon has been promoted. The order of preference is set out in Figure 2.1 on the following page:

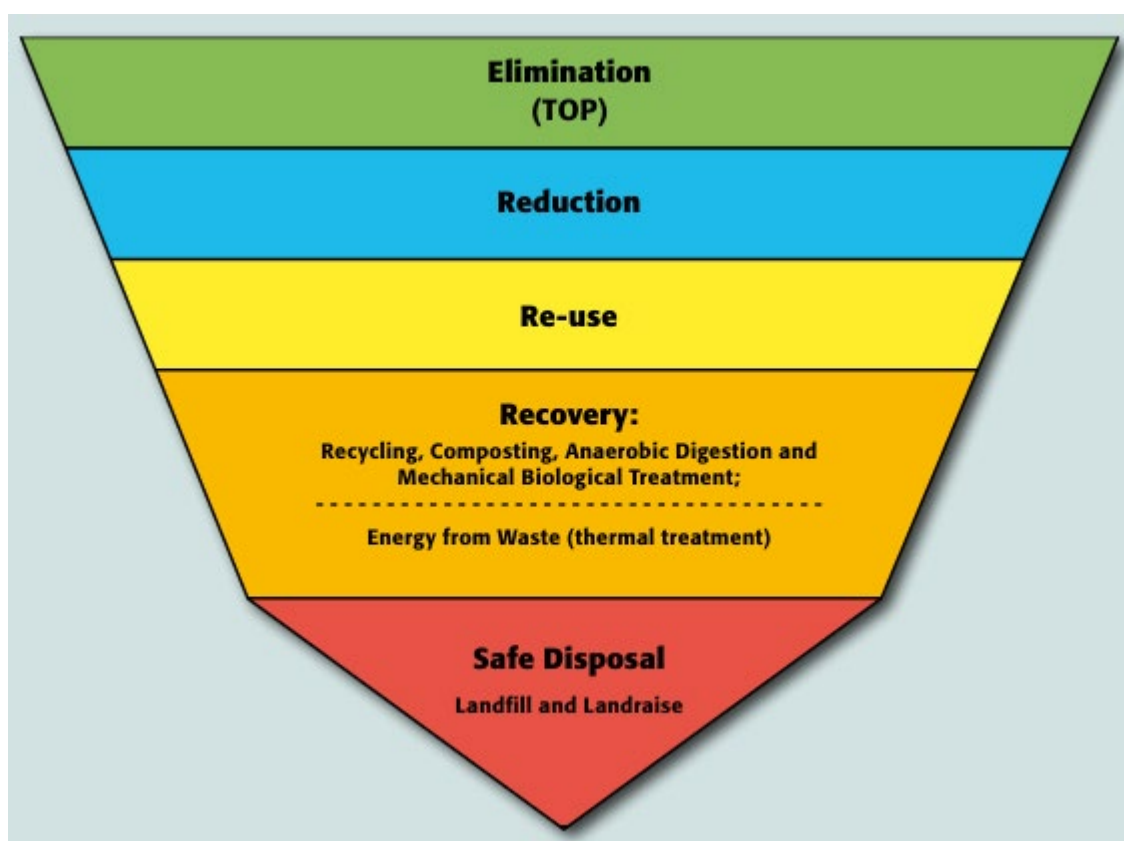


Fig 2.1: Wiltshire and Swindon Waste Hierarchy

WCS6: Waste Reduction and Auditing

Proposals for developments that meet the criteria below will be required to design and provide facilities for occupiers of the development to recycle / compost waste (bring systems) and / or facilities within individual or groups of properties or premises for the source separation and storage of different types of waste for recycling and / or composting.

- any new development of shopping centres or facilities where the total gross floorspace amounts to 500 square metres or more;
- any development of business, industrial, distribution or storage development where the gross floorspace / increase in gross floorspace amounts to 300 square metres or more;

Such provision will be expected to have regard to the existing capacity of facilities already available and to the existing Recycling Plan or Municipal Waste Management Strategy relevant to the area. Proposals for the developments identified above must also be accompanied by a waste audit, which must include:

- a. the type and volume of waste that the development process will generate (the development process comprises the construction process and any other operations necessary to bring the development into being);
- b. the steps to be taken to reduce, re-use and recycle any waste that is produced through the development process;
- c. the steps to be taken to reduce the production of hazardous wastes in the development process;

- d. the steps to be taken to minimise the use of raw materials in the development process;
- e. the steps to be taken to reduce the use of hazardous materials in the development process;
- f. the steps to be taken to minimise the pollution potential of unavoidable waste;
- g. the steps to be taken to dispose of unavoidable waste in an environmentally acceptable manner;
- h. the steps to be taken to ensure maximum waste recovery (e.g. recycling and composting) once the development is completed/occupied; and
- i. proposals for the transport of waste created during the development process and subsequent use of the site.

Development proposals outside of the thresholds above will be required to demonstrate that they have had sufficient regard to minimising waste produced as part of the development process and to the waste hierarchy in identifying a chosen management method for wastes that are produced as part of the development process.

2.3 Summary of Policy Requirements

Table 2.1 provides an overview of policy and legislative requirements and their applicability to the proposed development;

Table 2.1: Overview of Policy requirements

Policy	Requirement
Core Policy 41: Sustainable construction and low carbon energy	New development shall incorporate design measures to reduce energy demand, by way of good insulation, taking advantage of passive heating and passive ventilation. The development shall meet BREEAM Excellent standard, and will submit a Sustainable Energy Strategy, outlining the low-carbon strategy for the proposal.
Core Policy 50: Biodiversity and geodiversity	Development must demonstrate how features of nature conservation and geological value are protected, where not possible, impacts must be mitigated as far as possible, and appropriate compensation provided to ensure no net loss of local biodiversity resource. The development shall use appropriate measures to avoid/mitigate disturbance of wildlife and habitat through the lifetime of development. The development shall include measures to deliver biodiversity gains, through restoration, enhancement or creation of valuable habitats/networks.
Core Policy 51: Landscape	The development shall protect, conserve and enhance landscape character, and mitigate any negative impacts. This includes protecting species composition of natural features, visual amenity, tranquillity, light pollution, noise and motion.
Core Policy 52: Green Infrastructure	The development shall retain and enhance existing on-site GI, make provision for accessible open spaces in accordance with the 'Wiltshire Open Space Standards', plan for the appropriate long-term management of the planned GI.

Policy	Requirement
	The development shall be accompanied by an audit of the existing GI within and around site, and a statement demonstrating where possible the retainment and enhancement through the development process.
Core Policy 55: Air Quality	The development shall mitigate any poor air issues associated with the development, and plan for making a positive contribution towards the aims of the 'Air Quality Action Plan'
Core Policy 56: Contaminated Land	If contaminated, measures must be taken to mitigate the impacts of land contamination on public health, environmental quality, built environment and amenity and demonstrate suitability for use.
Core Policy 57: Ensuring High-Quality Design & Place-Shaping	The development must maintain and enhance natural features, e.g. trees, hedges, hedgerows, to enhance biodiversity and mitigate against losses occurring through the development. The development must use renewable energy sources, orientate itself to benefit from sunlight and solar energy. The development shall provide appropriate levels of amenity with consideration of privacy, overshadowing, vibration and pollution (including waste), also applying these principals to advertisements.
Core Policy 61: Transport and new Development	New development shall encourage the use of sustainable transport alternatives, and shall require a transport assessment. The council shall seek contributions towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives.
Core Policy 62: Development Impacts on the Transport Network	The development shall provide mitigating measures to offset adverse impacts on the transport network at construction and operation stages. The development should not be accessed directly from the national primary route network outside built-up areas.
Core Policy 67: Flood Risk	The development shall include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground, unless the site is unsuitable to these measures.
Core Policy 68: Water Resources	The development shall not prejudice the delivery of actions towards the relevant River Basin or Catchment Management Plan, and should contribute to their delivery where possible. The development shall incorporate water efficiency measures, and submit details of how water efficiency has been taken into account during the design of proposals. If the development is within a Source Protection, Safeguard or Water Protection Zone, it must assess any risk to groundwater resources and groundwater quality, and demonstrate these would be protected through construction and operation of the development.

Policy	Requirement
WCS5: The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management	The development shall demonstrate the waste hierarchy has been followed.
WCS6: Waste Reduction and Auditing	The development will provide facilities to recycle / compost waste with appropriate waste storage and separation. The facilities can be for the occupiers of the development, or sited within individual or groups of properties or premises. Proposals to be accompanied by a waste audit.

Where detailed designs are yet to be developed for the Drive Thru and EV hub to be applied for in outline, compliance with policy requirements shall be demonstrated at a high-level and used to guide a future detailed application.

3. SUSTAINABILITY ASSESSMENT

This section comprises the Sustainable Design Statement for the proposed development. The Sustainability Statement outlines the measures proposed in order to ensure compliance with the Wiltshire Core Strategy, with a particular focus on the following parameters:

- Energy Use
- Flood Risk
- Water use
- Materials
- Natural and Green Environment
- Sustainable Travel
- Waste

3.1 Energy Use

Relevant Policy	Core Policy 41: Sustainable construction and low carbon energy Core Policy 57: Ensuring High-Quality Design & Place-Shaping
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The energy assessment and subsequent design have been prepared such that it is aligned with the Energy Hierarchy, with particular focus on sustainable building design (reduction of energy consumption at source), provision of energy efficiency measures, and the installation of building-integrated low and zero carbon (LZC) technologies.

The conclusion of the energy strategy is that, based on planning stage calculations and implementation of the Energy Hierarchy, the proposed ALDI Foodstore development achieves a significant reduction in CO₂ emissions when compared with a Building Regulations Part L (2021) compliant development, hence meeting the requirements of Wiltshire Core Strategy, due to the below mentioned features. Compliance with Core Policy 41 requires a Sustainable Energy Strategy to be submitted alongside the planning application to outline the low-carbon strategy and achievement of BREEAM Excellent, which has been determined following an energy modelling exercise.

The savings are achieved through specification of a well-insulated and airtight building fabric, efficient M&E systems including an ASHP, and renewable/LZC technologies including a 'Freeheat' RHR system and 144kWp roof-mounted Solar PV array.

Details of the building fabric, building services, and renewable and LZC technologies proposed for the ALDI Foodstore development are summarised within table 3.1 overleaf.

Table 3.1: Proposed Building Design Values

Building Fabric Performance Values		Building Services & Renewable/LZC Technologies	
Walls	0.26 W/m ² K	Heating/Cooling	Air Source Heat Pump System (421% Efficiency)
Roof	0.16 W/m ² K	Lighting	100% LED

Building Fabric Performance Values		Building Services & Renewable/LZC Technologies	
Floor	0.16 W/m ² K	Hot Water	Instantaneous Electric DHW (100% efficiency)
Glazing	1.4 W/m ² K	Building Management	BMS with automated controls and monitoring
Doors	1.4 W/m ² K	Renewable/LZC Technology	144kWp roof mounted PV array
Vehicle Access Doors	1.3 W/m ² K		
Air Permeability	5m ³ /(hr.m ²)		'Freeheat' Refrigeration Heat Recovery system

A demonstration of the savings in carbon emissions through implementation of the energy hierarchy is included in Figure 3.1 below.

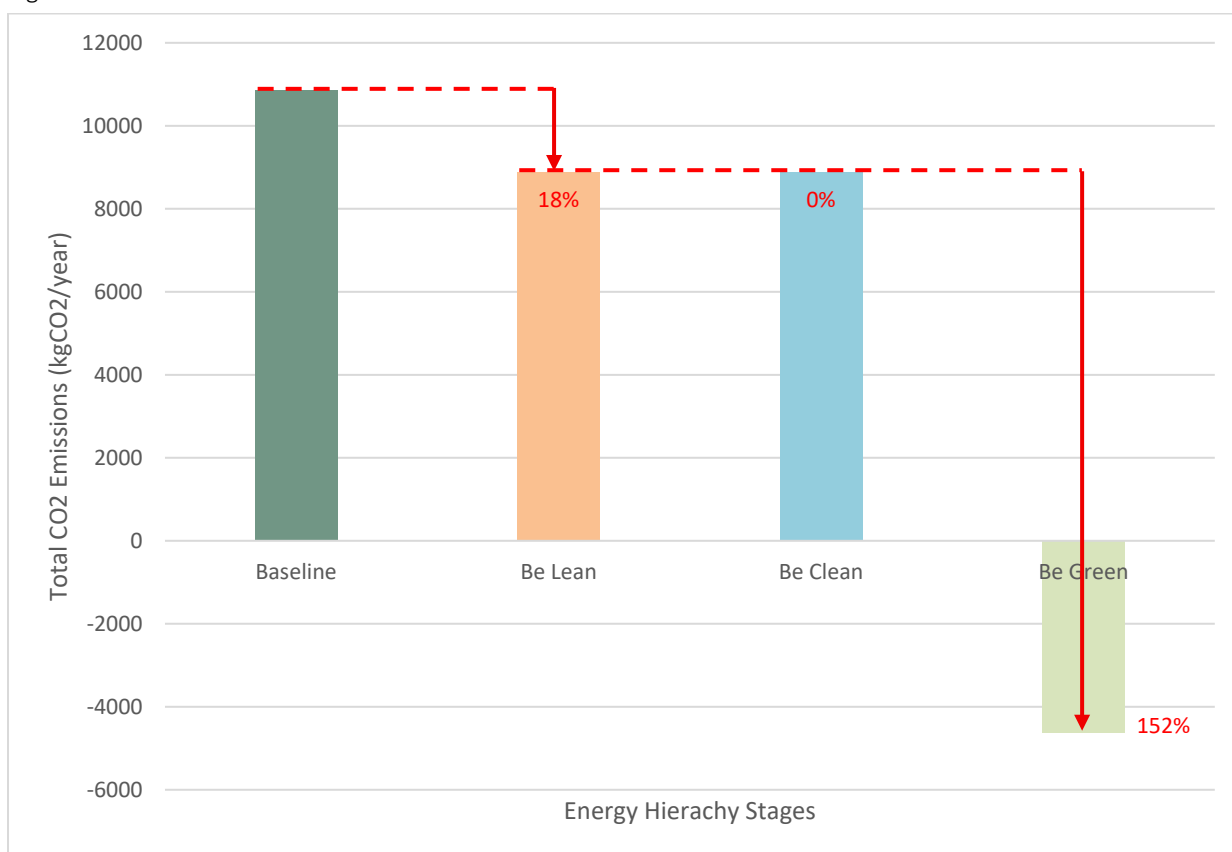


Fig 3.1: Energy Strategy CO₂ emissions reduction

Where detailed designs are yet to be prepared for the care home on site to be applied for in outline, measures have been recommended in line with notional Building Regulations Part L (2021) standards in order to demonstrate compliance with policy requirements as follows (ordered in accordance with the energy hierarchy):

- Passive solar design to achieve a reduction through passive measures as required by local policy; building orientation, room layout, limiting solar gain, landform and landscaping,

- Energy efficient design to achieve a reduction through passive measures as required by local policy; heat loss parameter (insulation) and air tightness, energy efficient fittings and controls, with the 'notional' fabric performance values recommended as detailed below:

<i>Element</i>	<i>U-Value (W/m²k)</i>	
	<i>Notional</i>	<i>Limiting</i>
Walls	0.18	0.26
Roofs	0.16	0.18
Floors	0.16	0.18
Doors	1.4	1.6
Windows	1.4	1.6
Air Tightness	5.0 m ³ / (h.m ²)	8.0 m ³ / (h.m ²)

- Incorporation of LZC heating / cooling technologies to achieve a reduction through renewable measures.

For more details including a breakdown of passive building design measures and a low and zero carbon technology feasibility study produced for the proposed ALDI Foodstore, please refer to the Energy Statement prepared by Sol Environment.

3.2 Flood Risk

Relevant Policy	Core Policy 67: Flood Risk
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Planning has a key role to play in managing flood risk for climate adaptation as water stress and extreme weather events are likely to become more severe in future. In areas which are susceptible to flooding, development proposals should ensure that the buildings are designed to be flood compatible or incorporate flood resilient measures to mitigate flood risk. This is incorporated into in accordance with all the requirements of the Lead Local Flood Authority (LLFA) and the National Planning Policy Framework (NPPF).

The site is located entirely on brownfield land within Flood Zone 1, which has a low probability of flooding from tidal or fluvial sources. The site is considered to have less than a 0.1% probability of river or sea flooding within any one year. The site is predominantly at very low risk of surface water flooding, with isolated areas on the low boundaries being shown at low risk and localised surface water management measures will be incorporated into the site design to address this. There is potential for groundwater emergence to occur on the site which presents a flood risk to the development, and this risk should be mitigated in the proposed design of the site.

Key flood mitigation measures include setting finished floor levels above the existing ground levels, provision of overland exceedance routing, and incorporation of a sustainable drainage system (SuDS) to manage runoff. The proposed drainage strategy has been developed in accordance with national policy and the SuDS hierarchy and will limit discharge rates to a reduction on pre-development runoff rates, with attenuation storage sized for up to the 1 in 100-year plus climate change event.

Based on the findings of this FRA, the proposed development is considered to be acceptable in flood risk terms and meets the requirements of the National Planning Policy Framework (NPPF), subject to confirmation by the Local Planning Authority (LPA) and Lead Local Flood Authority (LLFA).

For more information, please refer to the Flood Risk Assessment & Drainage Strategy prepared by Craddys.

3.3 Water Use

Relevant Policy	Core Policy 68: Water Resources
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The conservation of water resources and maximising resource efficiency is a central theme within the Wiltshire Core Strategy, requiring all developments to consider measures to minimise the impact on local water infrastructure and the environment.

To reduce the consumption of potable water from all sources and achieve a BREEAM 'Excellent' standard for water consumption in accordance with local policy, it is recommended that the following water using features (where specified) are installed within the proposed ALDI with similar or better flow rates:

Table 3.2 Flow rates for commercial water-consuming components

Commercial Components	Rate	Units
Taps (flow rate)	4.5	Litres/min

Commercial Components	Rate	Units
WC (dual flush volume)	3 / 4.5	Litres
Kitchenette sink taps	5	Litres/min
Dishwasher (domestic sized)	12	Litres /cycle

Based on the above specification for the development, 1 credit is likely to be achieved under the Wat 01 BREEAM Criteria, thereby demonstrating that BREEAM 'Excellent' minimum level can be achieved.

Local planning policy recommends the use of rainwater catchment systems or greywater harvesting and usage where feasible, however due to the very limited water use in the proposed foodstore development, it is unlikely that such harvesting systems will provide any significant benefits.

In aid of conserving water usage, it is recommended that a water leak detection system is installed on the incoming mains to detect and prevent any major water leaks. To further reduce the water consumption of the development, smart water metering shall be considered as well as solenoid shut-off devices linked to PIRs in WC or kitchenette areas.

3.4 Materials

Relevant Policy	Core Policy 57: Ensuring High-Quality Design & Place-Shaping
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All materials associated with the development shall be sourced with consideration for the embodied construction impacts. Local Policy requirements emphasise the importance of the usage of quality materials, and as such, the site will comprise, where possible of local sustainably sourced materials of a sufficiently robust construction to ensure a long life without the need for a regular maintenance or replacement.

The design team are committed to using their best endeavours to meet the following:

- 100% of timber and timber-based products will be legally harvested and traded timber and be from suppliers who are able to provide evidence of responsible sourcing via chain of custody certification through the following schemes: Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC)
- A pre-demolition audit of any existing structures or hard surfaces has been completed to determine if refurbishment/reuse is feasible. The audit found refurbishment/reuse not feasible for the majority of materials, including concrete, asphalt and tar, metals, inert waste, and mixed or other waste. These materials will be taken to a waste recycling facility for recycling. Timber will be diverted from landfill. Testing is to be carried out on the suitability of the soil for reuse on site. If the testing finds that this is not feasible, then the soil will be recycled.
- Targets will be set to ensure a proportion of materials will be sourced with the BRE Green Guide rating of A+, guiding the material selection in the design process.
- Targets will be set to ensure a proportion of materials are sourced from suppliers or manufacturers who implement an Environmental Management System. Selection will be based on the following hierarchy:
 - BES 6001 or industry equivalent

- ISO 14001 for key processes and supply chain
- ISO 14001 for key processes only
- Local supplier or manufacturer with no EMS
- National supplier with no EMS
- The use of local suppliers and manufacturers is encouraged and will form part of the selection process
- 15% of total material value will derive from reused and recycled content.

In selecting other materials, the following issues will be considered. The design and construction team will:

- Preferentially selected those materials with a lesser environmental impact;
- Review alternative materials that have a lower environmental impact when developing material specification, including recycled materials; and
- Review the embodied energy within potential building materials and reduction of the embodied energy where feasible.

3.5 Natural and Green Environment

Relevant Policy	Core Policy 50: Biodiversity & Geodiversity Core Policy 51: Landscape Core Policy 52: Green Infrastructure Core Policy 55: Air Quality Core Policy 56: Contaminated Land Core Policy 57: Ensuring High-Quality Design & Place-shaping
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In accordance with local planning policies, the proposed development commits to protecting and enhancing conservation sites, habitats and species, ensuring no adverse impacts on nature, preserving wildlife habitats, enhancing biodiversity, and mitigating the effects of the development upon the surrounding environment.

The existing site has been assessed for potential features of ecological value and habitats to determine the likely impacts of the proposals and any opportunity for improvements. After the nesting bird season in 2024 estate management works including clearance and maintenance was undertaken. Ecology site visits / surveys were undertaken in 2025. Some key ecological features are found to be in proximity to the site including three sites designated with international importance, two National Site Network sites, and three local non-statutory designated sites such as Lay Wood, Kennet and Avon Canal, and Roundway Plantation. Due to the distance between the sites and the lack of habitat connectivity, the impact on these sites is anticipated to be negligible.

The pre-development site consisted of developed land, including a training / office unit, garages, storage unit and W.C. block, and extensive hardstanding, bare ground and ephemeral vegetation of negligible ecological importance, and a native hedgerow of local ecological importance. The site is considered of negligible ecological importance for all protected and notable species, excluding reptiles, however reptiles are considered to be likely absent from the site. Habitats of local ecological importance to be lost, namely the native hedgerow, will be compensated for through replacement planting in the form of native tree, hedgerow and grassland planting, which is expected to provide nesting opportunities on site. The report recommends the implementation of two bat boxes and two bird boxes to enhance the habitats on site.

The Ecological Impact Assessment reports the post-development biodiversity to have a net loss of 89.35% of habitat units (4.15 units), and a net gain of 37.01% of hedgerow units on site. In order to achieve a net gain of 10% in habitat units, and satisfy trading rules, an off-site contribution of 4.61 habitat units and 0.97 Hedgerow units will be required.

It has been recommended that proposed mitigation and enhancement are secured through the production of a Construction Environmental Management Plan (CEMP) and a Habitat Management and Monitoring Plan (HMMP), and a sensitive lighting strategy for bats.

For more details, please refer to the Ecological Impact Assessment by Tyler Grange.

3.6 Sustainable Travel

Relevant Policy	Core Policy 61: Transport & New Development Core Policy 62: Development Impacts on the Transport Network
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A number of local planning policies are in place to guide sustainable transport initiatives for the development, requiring measures to be implemented to encourage the adoption of walking, cycling, and the use of public transport options. Where car parking is provided, developments shall incorporate electric vehicle charging facilities.

The foodstore development, which shall be applied for in full detail, is proposing a total of 91 car parking spaces for customer vehicles, including 4 DDA spaces (with 1 additional EV), 6 Parent & Child spaces (with 1 additional EV) and 8 additional EV charging spaces. This number of spaces is sufficient to serve the proposed development, with additional consideration to cycle parking standards, 4 Sheffield Stands are provided on the northern side of the store (accommodating 8 cycles).

The outline application scheme also proposes a drive through unit with EV charging hub at the northern end of the site, providing an additional 38 car parking spaces, including 3 DDA spaces, 4 motorcycle spaces, and 8 additional EV charging spaces.

The proposed development is located to the east of the A361 London Road, and north of Horton Road on the eastern side of Devizes. The site is surrounded by the Hopton Road / Waller Road employment area / Hopton Park Industrial Estate, a car wash and petrol station, and land with planning permission for an employment development for up to 25,000 m². There are both residential and existing and permitted employment destinations within a 1km walk of the site, resulting in a substantial staff and potential customer pool within the 2km walk catchment. The location of the site will allow customers to visit the store as part of an existing journey along the A361 London Road, meaning that these trips can serve an additional purpose with little or no extra travel distance.

The existing site is accessible to pedestrians and cyclists via the shared footway/cycleway on the southern side of Horton Road which is street lit, includes crossing with dropped kerbs, and has an approximate width of between 1.8m and 2.3m. There is a footway/cycleway along London Road provides traffic free and direct cycle access (with the exception of side road junctions). The site is deemed accessible by public transport, therefore no increase in local service provision is anticipated to be required.

The development proposals will focus on providing high quality pedestrian and cycle connections between the site and existing infrastructure. The outline planning permission proposals include a new purpose built pedestrian and cyclist access directly to Horton Road, with a link directly to the eastbound bus stop on Horton Road, and a proposed crossing (including dropped kerbs and tactile paving) joining to the footway/cycleway on the southern side of Horton Road. The proposals include a new purpose built 2m wide pedestrian link between the Site and Waller Road / Hopton Road / Hopeton Park Industrial Estate to the north of the site, including a new crossing of London Road with dropped kerbs, tactile paving and a pedestrian island. The proposed site provides opportunities for staff and customers to make trips by foot and cycling.

The outline planning permission proposals include a new ghost island priority junction for access via car.

For further information, please refer to the Transport Assessment, ALDI Discount Foodstore Travel Plan, and the Drive Thru Unit With EV Charging Hub Travel Plan prepared by Connect Consultants.

3.7 Waste

Relevant Policy	WCS5: The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management WCS6: Waste Reduction and Auditing
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The development site will utilise sustainable design and construction to minimise the impact the building has on the environment. Good site practices will be employed during the construction phase in order to minimise waste during construction and operation and promote the circular economy.

3.7.1 Construction Waste

A Site Waste Management Plan (SWMP) will be implemented to encourage the principles of the waste hierarchy which are to reduce, reuse and recycle waste. The target is to recycle a minimum of 95% of the waste that will be removed from site. The following measure will be implemented;

- Ensuring that all contractors are contractually obliged to participate in reducing waste from site, which is included in our Sustainability Policy
- Reduction of materials wastage through efficient buying, good storage and handling
- Use of Modern Methods of Construction for a significant proportion of the development, allowing significant reductions in waste and facilitating greater recycling
- Entering into agreements with suppliers for recovery and disposal of their products including plasterboard offcuts, insulation offcuts and timber pallets
- Ensuring that all suppliers of materials provide returnable practicably recyclable packaging
- Providing sustainability training, including waste minimisation, for all the construction site team
- Regular toolbox talks throughout the construction phase to raise awareness of the importance of minimising; segregating and recycling wastes during the construction process
- Ensuring adequate waste storage facilities are provided for both raw materials and waste streams generated (e.g. Timber, Metal, Plasterboard and General Waste)
- Ensuring adequate security measures are in place

A pre-demolition audit of any existing structures or hard surfaces has been completed to determine if refurbishment/reuse is feasible. The audit found refurbishment/reuse not feasible for the majority of materials, including concrete, asphalt and tar, metals, inert waste, and mixed or other waste. These materials will be taken to a waste recycling facility for recycling. Timber will be diverted from landfill. Testing is to be carried out on the suitability of the soil for reuse on site. If the testing finds that this is not feasible, then the soil will be recycled. Hazardous materials will be sent to landfill.

3.7.2 Operational Waste

The importance of reducing the overall impact of waste generation by promoting the recycling of materials during the operational phase of the Proposed Development is a key consideration within the local planning policies. To achieve this, an operational waste management strategy will be implemented, focusing on plastics, cardboard, timber pallets, and food waste recycling. The strategy will provide for the requirement and operation of clearly segregated storage areas for recyclable waste, including a small receptacle for batteries. The foodstore will have a Compactor-Baler located within the warehouse area, to compact cardboard packaging for recycling. Excluding those already stated, no other generally recyclable waste streams (glass, metals, textiles, electronics) are anticipated, however where possible will be sent to the nearest Regional Distribution Centre for recycling. A Deposit Return Scheme for bottles and cans is currently under trial and may be implemented nationally in the future.

It is recommended that collections of recyclables are coordinated with the delivery of stock. Materials for recycling will be collected in segregated areas on a daily basis and returned to the nearest Regional Distribution Centre where waste is forward for recycling. Timber will be re-used and recycled at the end of its life at the RDC.

As all Cardboard, Polythene, store product and food waste is recycled, general waste is minimal and is collected weekly, though frequency of general waste collections will be reviewed to avoid overspill of waste. A manager will scan all Produce, Flowers, Bakery, and Ambient waste daily, and data can be used to inform ordering quantities, thereby reducing waste.

A Too Good to Go scheme will be in place in the building. Food products from all fresh commodity groups on their last day of life can be sold via Too Good To Go. Some products that cannot be sold to customers can be donated to local charities.

3.8 BREEAM

Relevant Policy	Core Policy 41: Sustainable Construction and low-carbon energy
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The proposed development is required to achieve at least a BREEAM 'Excellent' rating in order to comply with Core Policy 41. The results of the BREEAM Pre-Assessment demonstrate that the development is likely to gain a **BREEAM 'Excellent'** rating using the BREEAM V6 New Construction tool. The total score of **73.73%** for the proposed scheme as a whole is within the 'Excellent' bracket of 70% - 85%.

Figure 3.2 below shows a summary of the percentage of available credits which are likely to be achieved in each section (land use & ecology, management, etc.), given current design intent, for the proposed development.

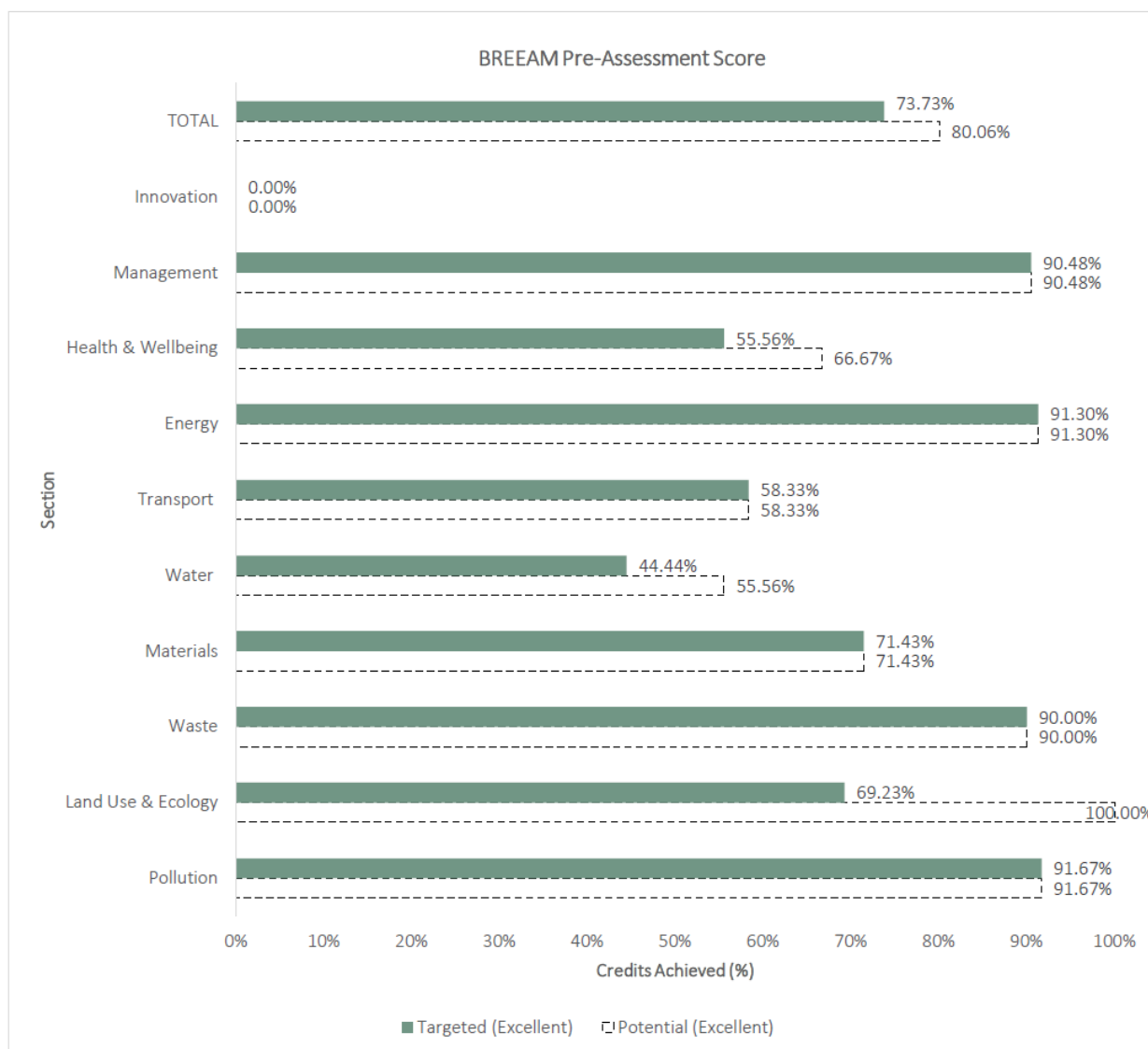


Figure 3.2 Predicted percentage of the total score targeted and a breakdown of the percentage of credits closed out in each Section for the development. The potentially improved score, taking in consideration opportunities nominated in Section 5, is shown dashed.

Based on the initial BREEAM target score to achieve an 'Excellent' rating, the development is found to perform well in the following environmental categories:

- **Management:** Sustainable management practices in connection with design, construction, commissioning, handover, and aftercare.
- **Energy:** Efficient building and material selection, the specification of low carbon mechanical systems and lighting and metering throughout the building.
- **Waste:** Reduction of waste from construction and throughout the lifetime of the building.

- **Pollution:** Prevention and control of pollution and surface water run-off associated with the building's location and use.

For more details, refer to the BREEAM Pre-Assessment report prepared by Sol Environment.

4. SUMMARY

The Wiltshire District Council is committed to achieving sustainable development. As a result, the current planning policies emphasise the importance of sustainable growth with particular emphasis on the encouragement of energy efficiency and sustainable travel. It is important, therefore, that the proposed development site contributes to the Council's sustainability aims as well as meeting regional and national objectives for sustainable development.

This sustainability statement demonstrates that the proposal satisfies a number of key objectives, responding to local needs and requirements and conforming to current good practice. The site selected demonstrates a sustainable allocation for development, bringing forward the development of highly visible brownfield site on a key route into Devizes.

A comprehensive Sustainable Drainage Strategy shall ensure that surface water is effectively managed, including with attenuation storage sized for up to the 1 in 100-year plus climate change event. Key flood risk management measures include setting finished floor levels above the existing ground levels, provision of overland exceedance routing.

Water conservation has also been prioritised, with efficient sanitaryware features proposed to achieve a reduction in water consumption over the modelled baseline to achieve a BREEAM minimum standard of 'Excellent' for the foodstore development. Additional water savings measures considered include leak detection, smart metering, and PIR-linked shutoff valves.

Measures will be implemented to compensate for any losses in biodiversity, through replacement planting in the form of native tree, hedgerow and grassland planting. The implementation of two bat boxes and two bird boxes is recommended to enhance the habitats on site. In order to achieve a net gain of 10% in habitat units, and satisfy trading rules, an off-site contribution of 4.61 habitat units and 0.97 Hedgerow units will be required.

Sustainable transport measures are supported by the inclusion of electric vehicle charging spaces, cycle storage spaces, and a Staff Travel Plan. The location of the development provides a good level of access for pedestrians, cyclists, and users of public transport. Given the existing level of site accessibility, the development proposals will focus on providing high quality pedestrian and cyclist connections between the site and existing infrastructure.

Sustainable material sourcing is embedded in the design approach, including responsible timber procurement, high BRE Green Guide ratings, and the use of recycled content. Waste generated throughout construction and operation will be minimised with targets set for recycling rates and diversion of materials from landfill.

In summary, the sustainability statement has informed the design process by identifying opportunities and constraints for sustainable development, and the process has highlighted the proposals sustainability performance against national, regional and local planning policy.