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Planning App Ref:	PL/2026/01361
Service Ref:	Drainage
Date:	03/04/2026

PROPOSAL

Hybrid planning application comprising 2No. severable components seeking: (i) full planning permission for the development of a Class E(a) food store and associated customer car parking / access / service arrangements, in addition to: (ii) outline planning permission for a drive thru unit with EV charging hub and associated customer car parking / access / service arrangements.

SITE LOCATION

The Bike School, London Road, Devizes, SN10 2JG

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
- Flood Risk Assessment and Drainage Strategy
- Geo-Environmental Appraisal - Site Investigation Report

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 application is a hybrid application for 2 severable components seeking:

- (i) Full planning permission for the development of a Class E(a) food store and associated customer car parking / access / service arrangements
- (ii) Outline planning permission for a drive thru unit with EV charging hub and associated customer car parking / access / service arrangements.

The Flood Risk Assessment (FRA) confirms that the development sites lie within Flood Zone 1, indicating a low probability of fluvial flooding, and are at low risk of surface water flooding. The Wiltshire Council Strategic Flood Risk Assessment (SFRA) classifies the site as having a low to negligible risk of groundwater flooding, which aligns with the findings of the site investigation in Section 4.5 of the submitted Flood Risk Assessment and Drainage Strategy.

No existing surface water drainage system is known to be present – several gullies are identified on the topographical survey however the discharge route of gullies is not currently known.

For the outline element of the application relating to the proposed drive-thru unit, no drainage strategy has been submitted.

A Drainage Strategy has been submitted for the food store, but this does not adequately demonstrate compliance with national and local surface water management requirements. Insufficient justification has been provided to confirm why discharge to the existing surface water sewer is necessary, given that in Section 7.10 of the Geo Environmental Appraisal identifies infiltration test with results ranging between 1.20×10^{-6} m/s and 1.40×10^{-5} m/s (noting that details have been omitted from the appendix). The proposed discharge rate does not align with Wiltshire Council's betterment policy. The controlled surface water discharge rate for the 1 in 1 year return period rainfall event should be as close as possible to greenfield rates and provide a minimum 30% reduction compared to the existing brownfield runoff rate. In accordance with Standard 2 of the National Standards for SuDS required interception storage calculations have not been submitted. Furthermore, the drainage plans lack clarity regarding network connectivity to the proposed attenuation tank, and inconsistencies in the drainage area used for attenuation sizing require clarification.

In addition, appendix 12 – Soil Percolation Testing Results is missing from the submitted Geo-Environmental Appraisal.

A holding objection is recommended as the Drainage Strategy does not demonstrate compliance with the surface water disposal hierarchy. In particular, there is insufficient evidence that methods higher up the hierarchy, such as infiltration-based SuDS, have been exhausted.

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 detailed review of the drainage and flood risk aspects of the proposal:

- 1. To demonstrate compliance with the National Standards for Sustainable Drainage Systems, Standard 1, paragraph 1.2, the applicant must provide a clear and justification for not pursuing an infiltration-led surface water drainage strategy, despite on-site testing suggesting that the discharge of surface water via infiltration may be possible. To resolve this,**

- The applicant shall undertake BRE Digest 365-compliant infiltration testing to understand the impact of peak winter groundwater levels on infiltration rates.
- The results of the winter testing shall be submitted alongside the results of the previously undertaken infiltration testing, which have not been provided within Appendix 12, in order to allow complete assessment of the site's infiltration potential.

- 2. The site is located within an area identified as being susceptible to groundwater flooding. The submitted borehole and infiltration testing was undertaken during July only and therefore does not represent worst-case seasonal groundwater conditions.**

If the site is located in an area susceptible to groundwater flooding. Therefore, in line with [Wiltshire Council's Groundwater Management Strategy](#), the applicant is required to carry out a site-specific groundwater flood risk assessment that includes all available information and data from local sources such as historical records, parish councils, flood action groups and borehole records. In areas susceptible to groundwater flooding infiltration SuDS is not permitted unless it can be demonstrated to be appropriate. The groundwater assessment must include/consider the following:

- Groundwater level monitoring (taking into account seasonal variations).
- The interaction between different sources of flooding.
- How groundwater will impact on the proposed drainage system.
- The interaction between groundwater, groundwater recharge and aquifers.

The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption.

- 3. Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.**
- 4. The site layout does not demonstrate that interception storage has been considered in accordance with Standard 2 of the National Standards for SuDS. The site layout should be updated to demonstrate the inclusion and arrangement of interception storage features.**
- 5. Tabulated comparison of pre-development greenfield rates, existing brownfield rates, and proposed post-development discharge rates. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).**

6. 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 site has been designed to ensure that flows in excess of the 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.

7. Cross section and standard detail drawings should be provided for any attenuation, conveyance or infiltration features and their components.

8. Pre and post development exceedance flow routing shall be provided to demonstrate that flood risk is not increased towards Horton Road or any other nearby site. The submitted details shall clearly demonstrate that exceedance flows are safely managed within the site boundary and discharged in a controlled manner that does not pose a flood risk to Horton Road

9. A drainage strategy is required to support the outline applicant for the drive through unit and EV charging hub. The surface water drainage strategy should include/demonstrate the following in accordance with the Wiltshire Council requirements, NPPF, PPG, and National Technical Standards for SuDS.

- Evidence that the [surface water disposal hierarchy](#) has been applied.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
- Existing pre and post development runoff rates for the site, in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- Calculations that demonstrate the sizing of any attenuation/ SuDS features and cross section drawings of these features.
- 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 a sufficient height above the SW drainage cover levels.
- Evidence that the proposed drainage design provides a sufficient level of water treatment.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.
- If 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](#).

Following the removal of the holding objection, the drainage team have the following conditions which need to be addressed by the applicant:

- 1. No development shall take place until further details related to the surface water drainage strategy are submitted for the Aldi Food Store, ensuring compliance with Wiltshire Council requirements, NPPF, PPG, Non and the National Standards for SuDS. All details must be submitted to and approved in writing by the Local Planning Authority.**
 - The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
 - If infiltration is proposed, it is implemented in manner that does not create an offsite impact, particularly if there are reports of groundwater flooding in the area.
 - Evidence that the finished floor levels above the maximum predicted 100-year flood level or if no flooding is predicted, at 150 mm height above the SW drainage cover levels

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- The applicant is referred to Wiltshire Council's [Surface Water Soakaway Guidance](#) for the standards that must be met for planning approval and adoption
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever it is 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
- The sewerage undertaker should be consulted at an early stage to ensure that sufficient capacity is available in the existing sewer system. In accordance with Standard 1 of the National Standards for SuDS, where a connection is to be made to the surface water or combined sewer, the applicant shall provide confirmation from the sewerage undertaker that the connection will not result in an increase in flood risk, and acceptance of an agreed connection point and discharge rate for surface water disposal.
- 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 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.