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Planning App Ref:	PL/2026/02458
Service Ref:	Drainage
Date:	06 May 2026

PROPOSAL

Full planning permission

Full application for the construction of a new food store (Class E) with associated parking, landscaping, drainage and servicing. The proposed development incorporates: • A single storey building with a total floor space of 2184m² (GIA) including a net sales area of 1529m². • 132 car parking spaces including 6 disabled bays, 9 parent and child spaces and 2 electric vehicle charging spaces. • Comprehensive landscaping scheme. • SUDS drainage scheme.

SITE LOCATION

Land East of Eastern Way, Melksham

SUMMARY OF THE CONSULTEE POSITION

Object	X
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Design and Access Statement
- Flood Risk Assessment and Drainage Strategy
- Geo-Environmental 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 site is located wholly within Flood Zone 1 and is therefore at low risk of flooding from fluvial sources. The FRA appropriately considers all potential sources of flooding, including surface water, groundwater and sewer flooding, and concludes that the site is at low risk.

The proposed surface water drainage strategy accords with the SuDS hierarchy. Infiltration has been discounted due to ground conditions, discharge to a watercourse is not practicable, and discharge to the existing highway surface water sewer on Eastern Way is proposed, subject to agreement with the Highway Authority.

However, Section 5.5 states '*BRE 365 infiltration testing is needed to confirm suitability for surface water infiltration*'

Surface water runoff from the site will be restricted to the greenfield runoff rate of 5.3 l/s (QBAR) for all storm events up to and including the 1 in 100 year event plus 45% climate change allowance however this is not in line with WCC betterment policy. The applicant needs to show the 30% betterment on the 1 in 1yr event as well. It is noted that this is unlikely to significantly impact on the attenuation size as that will be governed by the larger magnitude events, and therefore this is a detail that can be resolved at a future stage

Furthermore, a final discharge point has not yet been presented: Two are shown on the drainage strategy plan

The current drainage approach does not currently prioritise source control features and solely relies on pipe to tank system with an interceptor to provide water quality

Connection to the highway drainage system is not encouraged and other methods of surface water disposal should be considered first. Connection to highway drainage should only be seen as a last resort after exhausting all other options.

Appropriate surface water treatment is proposed in accordance with CIRIA SuDS guidance

RECOMMENDATION

Object for the following reason(s):

The applicant has not provided a viable drainage strategy that aligns with WCCs requirements and that of the [National Standards for SuDS](#):

The developer should provide the following information as part of future planning applications

Standard 1: runoff destinations

- Post development runoff rates. These must also be in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
- Evidence that the [surface water disposal hierarchy](#) has been applied and how all other options have been exhausted.
- 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.
- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- The following information is required in support of any proposal to connect surface water into a highway drain:
 - CCTV survey from the proposed connection point to the outfall point of that system (even if it's 1km+ away).
 - Hydraulic modelling of the system, and evidence that the proposed discharge would not cause surcharge/flooding/capacity issues downstream.
 - If surcharge/flooding/capacity issues occur, a schedule of works for repairs/upgrades to the downstream system, including hydraulic modelling evidence that the repairs/upgrades will provide sufficient capacity.

Standard 2: interception

- The first 5mm of rainfall from the majority of rainfall events will be managed by interception features and will not result in runoff from the site to surface water or piped systems.
- SuDS source control measures to manage water quantity and maintain water quality will be implemented wherever possible, and throughout the management train, so the development is not reliant upon large attenuation features close to the points of discharge.
- A schedule and plan of interception features must be provided, showing their location, type, and contributing catchment.
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Standard 4: water quality

- At least two stages of SuDS treatment must be provided for runoff from high-risk areas (e.g., car parks, roads), and at least one stage for low-risk areas (e.g., roofs).
- Calculations and supporting plans must be submitted to evidence compliance.
- A maintenance plan must be provided to ensure the long-term effectiveness of water quality treatment.

Standard 5: amenity

- The applicant must provide details of how SuDS features will deliver amenity benefits, including integration with public open space, accessibility, safety, and opportunities for recreation or education. Plans should clearly show how SuDS contribute to the quality and usability of the site for future occupants and the wider community. Note this may require additional engagement with the council's urban design and landscape officers.

Standard 6: biodiversity

- The applicant must provide details of how SuDS features will deliver biodiversity benefits, including planting schedules, habitat creation, and connectivity to existing ecological networks.

A biodiversity net gain statement should be included, demonstrating how the SuDS proposals contribute to site-wide ecological enhancement. Maintenance plans should support the long-term success of these features. Note this may require additional engagement with the council's ecology and landscape officers.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- 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.
- A plan showing the cross sections and design of any attenuation pond and its components.
- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- 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.

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.

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.