

To:	Jonathan James	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01361
Service Ref:	Drainage
Date:	13/07/2026

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 (Feb 2026)
- Flood Risk Assessment and Drainage Strategy (June 2026)
- Geo-Environmental Appraisal - Site Investigation Report (Feb 2026)

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 applicant has reconsulted with revised Flood Risk Assessment and Drainage Strategy, in order to address the issues raised in the previous drainage response issued on 03/04/2026.

It is appreciated that the applicant has proposed two potential drainage strategy options. The LLFA supports the applicant's pursuit of an infiltration-based drainage strategy to demonstrate adherence to the surface water drainage hierarchy in principle. However, further information is required to demonstrate that this approach is feasible and can be implemented effectively.

The LLFA notes that intrusive ground investigation works were undertaken at the site in April 2026, with no groundwater recorded within the monitored standpipes during the investigation period. However, the Exploration Hole Location Plan prepared by Groundtech Consulting identifies a total of 17 borehole locations across the site, whereas the summary table presented in Section 4.2 of the Flood Risk Assessment only provides groundwater information for six boreholes. Groundwater monitoring data has not been provided for the boreholes undertaken across the site. In the absence of groundwater level records, it would normally indicate that groundwater was not encountered during the site investigation. The applicant should therefore provide clear confirmation as to whether this is the case, to ensure that groundwater conditions and the potential risk of groundwater flooding can be appropriately assessed.

The applicant has provided historical infiltration test results undertaken on 02/07/2025. However, it is noted that the testing was carried out during the summer period and is not considered fully BRE 365 compliant, as the soakaway tests were not allowed sufficient time to drain below 25% of the effective test depth (the infiltration results have been extrapolated). Consequently, the reliability of the derived infiltration rates remains uncertain.

In addition, no evidence has been provided to confirm that Wessex Water has agreed in principle to accept surface water discharge into the existing public sewer network.

Given the uncertainty regarding the viability of infiltration and the lack of confirmation from Wessex Water, the LLFA cannot be satisfied that either Drainage Option A or Drainage Option B represents a feasible surface water drainage solution, in its current state. Therefore, the ultimate means of surface water disposal has not been adequately demonstrated.

The applicant has proposed the use of permeable paving within parking areas to provide interception storage in accordance with Standard 2 of the Non-Statutory Technical Standards for SuDS. However, no supporting calculations or evidence have been provided to demonstrate how the proposed permeable paving delivers the required interception storage. The applicant should therefore provide the relevant calculations and supporting details to justify the proposed approach.

The comparison table of pre-development runoff rates identifies a significant discrepancy between the calculated greenfield runoff rates, with the FEH method estimating a 1 in 100-year runoff rate of 6.2 l/s compared to 136.4 l/s using the Modified Rational Method (MRM). No explanation has been provided to justify the considerable difference between these estimates.

The applicant should review the calculations and provide a revised comparison table that clearly distinguishes between:

- Greenfield runoff rates;
- Existing brownfield runoff rates; and
- Proposed controlled discharge rates.

Furthermore, the proposed controlled discharge rate appears unchanged from the previously submitted drainage strategy. The Council's requirements are that the post-development surface water discharge rate should be restricted to as close as reasonably practicable to the greenfield runoff rate for the 1 in 1 year rainfall event or alternatively achieve a minimum 30% reduction compared to the existing brownfield runoff rate for the same event.

The LLFA acknowledges that the applicant has provided hydraulic modelling outputs for the proposed soakaways and attenuation features. However, hydraulic calculations for the full proposed drainage network have not yet been provided.

The applicant should provide a complete set of hydraulic calculations for the proposed drainage system, prepared in accordance with the submitted drainage layout. The model should include all proposed pipes, manholes, and SuDS features, with pipe and manhole references clearly matching those shown on the drainage drawings.

In addition, a clearly labelled drainage layout plan should be provided showing the full pipe network, flow routes, manhole references, discharge points, and all proposed SuDS components to enable the LLFA to undertake a comprehensive review of the proposed drainage strategy.

Based on the information submitted within the Flood Risk Assessment, the requirement for further groundwater flood risk assessment can be removed. However, the FRA does not satisfactorily address the remaining drainage concerns and information requirements. Therefore, the LLFA recommends maintaining a holding objection until the outstanding matters have been resolved.

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

Recommended Conditions – Full Planning Application and Outline Planning Application

1. Updated and clearly labelled drainage layout plan for both options A and B showing the pipe networks and any attenuation/ SuDS features. The plan should show all pipe & node numbers referred to within the drainage calculations.
2. Evidence should be provided to demonstrate that infiltration testing has been undertaken in accordance with BRE 365 and confirms that infiltration is a feasible means of surface water disposal. The number and location of trial pits should be appropriate to the scale of the development and positioned in the proposed locations, or close to the proposed locations, of future soakaways.
3. Evidence that the correct clearances have been adhered to. Based on CIRIA C574 guidance the appropriate clearance depends on geological conditions. However, 5m is the minimum for any ground condition.
4. Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.

Given that the existing Wessex Water surface water sewer in the area is reported to surcharge during the 1 in 1 year rainfall event, confirmation from Wessex Water is essential to demonstrate the viability and deliverability of the proposed Option B drainage strategy.

5. It is noted the applicant has proposed permeable paving and tree pits that will contribute to interception storage at the site. To demonstrate adherence to Standard 2, the applicant must provide calculations that provide evidence the first 5mm of rainfall for the majority of rainfall events will be managed by these interception features & will not generate runoff.
6. The applicant has not adequately demonstrated why rainwater harvesting cannot be incorporated within the proposed drainage strategy. The fact that rainwater harvesting alone may not achieve the full volume control requirements does not justify its exclusion. In accordance with Standard 1 of National Standards for SuDS, rainwater harvesting shall be considered.
7. Evidence that the proposed drainage design provides a sufficient level of water treatment.
8. 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](#).

The comparison table shall clearly present the Greenfield, Brownfield, and proposed controlled discharge rates for each relevant rainfall event (including the 1 in 1 year and 1 in 100 years plus climate change events, where applicable), to enable a clear comparison between existing and proposed site runoff rates.

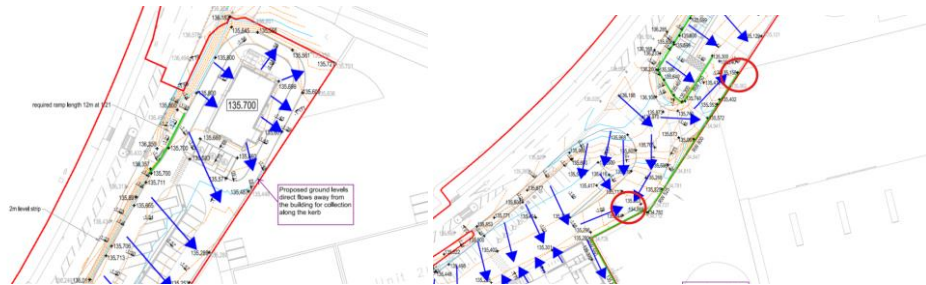
9. The applicant shall provide the complete proposed surface water network analysis. All manholes, pipes, and drainage features within the model outputs shall be clearly annotated and use reference numbers that match those shown on the proposed drainage layout plan, allowing the hydraulic calculations and drainage drawings to be cross-referenced and reviewed.

The surface water drainage strategy should demonstrate that:

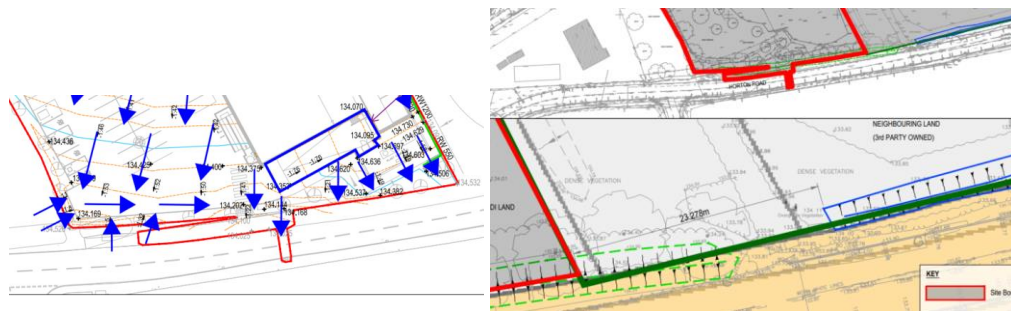
- The 1 in 30-year rainfall event is contained within the drainage system without causing flooding to any part of the site.

- The 1 in 100 years 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.

10. It is noted that the applicant has provided an exceedance flow routing plan; however, further details are required in order to demonstrate adherence to National Standard 3. The submitted plan indicates that the proposed drive-through building may be at risk of flooding during exceedance events, and low points along the north-western site boundary could result in ponding and increase flood risk to adjacent third-party land.



Furthermore, it is unclear how exceedance flows will be conveyed in a controlled manner to the receiving ditch adjacent to Horton Road. As the ditch begins further east of the site, exceedance flows may travel along Horton Road before being intercepted. The applicant shall demonstrate that exceedance flows can be safely managed without increasing flood risk to Horton Road or surrounding land.



Where surface water ponding is proposed within designated hardstanding areas as part of the exceedance flow strategy, these areas shall be clearly identified on the relevant drawings using appropriate hatching. Details of the maximum predicted depth of standing water shall be provided.

Recommended Conditions – Outline Planning Application

11. 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.

INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- Any soakaways should be designed and constructed in accordance with CIRIA C574 and the Wiltshire Guidance.
- 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.