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| <b>To:</b> | Jonathan James | <b>From:</b> | Rahul Dixit |
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|--------------------------|---------------|
| <b>Planning App Ref:</b> | PL/2026/03683 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 23/07/2026    |

## PROPOSAL

Full Planning Permission for Demolition of existing buildings. The erection of a freestanding restaurant/takeaway with drive thru facility, car parking, landscaping and associated works, including Customer Order Displays.

## SITE LOCATION

Cannings Hill Garage, Horton Road, Devizes, SN10 2JG.

## SUMMARY OF THE CONSULTEE POSITION

|                                                 |          |
|-------------------------------------------------|----------|
| Object                                          |          |
| Holding Objection: Further information required | <b>X</b> |
| Support                                         |          |
| No comment                                      |          |
| No objection                                    |          |
| No objection subject to conditions              |          |
| Consultation not required                       |          |

## APPLICATION DOCUMENTS REVIEWED

- Application Form
- Block Plan
- Building 1- Existing Elevations
- Building 2 & 3 – Existing Elevations
- Drainage Maintenance Plan
- Drainage Statement
- Proposed Elevations and Sections
- Site Layout Plan- As Existing
- Site Layout Plan- As Proposed
- Site Layout Plan- Demolition
- Site Location Plan
- Supporting Statement.

## ASSESSMENT OF THE PROPOSAL

### *Context*

In planning terms, flood risk refers to the potential for development to increase the likelihood or severity of flooding on-site or elsewhere, while drainage considerations relate to the capacity of the site and surrounding infrastructure to manage surface water runoff in a sustainable and effective manner.

The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

### *Assessment*

According to the SFRA, the proposed site lies within Flood Zone 1 with a low risk of fluvial, pluvial flooding and has low risk of groundwater flooding.

The site is currently occupied by a car sales showroom, petrol filling station, vehicle testing and repair centre, and a car wash facility.

An intrusive ground investigation is required to assess ground conditions, contamination risks and infiltration potential. The applicant's statement that infiltration is unlikely is not sufficient evidence to discount infiltration as a drainage option. Furthermore, the potential for contamination has been identified and requires further assessment. It is noted that in Section 5.6 of the Drainage Statement, future investigations are proposed; these should confirm whether infiltration-based drainage can be utilised safely and without increasing risks to controlled waters or other environmental receptors.

The submitted drainage layout indicates that surface water runoff will be managed through a range of drainage components including permeable paving, filter drains, shallow enhanced swales, proprietary treatment measures and cellular attenuation storage prior to discharging into existing public storm sewer at controlled discharge rate of 0.5 l/s. However the applicant has not provided evidence demonstrating Wessex Water will accept flows into their system; this is therefore not a viable strategy in the current state.

Whilst supporting drainage calculations and technical appendices have been submitted, insufficient information has been provided to demonstrate that the drainage hierarchy has been fully considered. In particular, no evidence has been submitted to confirm that opportunities for rainwater harvesting or reuse have been assessed. Furthermore, infiltration has been discounted without the support of site-specific infiltration testing or ground investigation data.

## RECOMMENDATION

### Holding objection as further information required

At this stage the LLFA are recommending a holding objection as the applicant has not provided sufficient information to demonstrate there is a feasible drainage strategy:

- The LLFA notes in the attached correspondence with Wessex Water, there is no evidence of an agreement to discharge surface water flows into the Wessex Water network. To demonstrate there is a feasible surface water drainage strategy, the applicant must be required to provide evidence that Wessex Water will accept flows.
- Evidence that the [surface water disposal hierarchy](#) has been applied. The LLFA notes Wessex Water's comments in the attached correspondence that outline compliance with the SuDS hierarchy is required. The applicant must demonstrate that all options prior to discharging to surface water sewers within the drainage hierarchy have been exhausted.
- 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
- The drainage statement notes in Section 5.2 that several SuDS features have been discounted due to space constraints. The LLFA does not consider lack of space alone to be sufficient justification for ruling out SuDS measures. The drainage strategy must demonstrate that the SuDS hierarchy has been fully applied and that all reasonably practicable source control, conveyance and attenuation features have been considered for the proposed development.
- The applicant must resubmit an updated layout and provide supporting evidence, including calculations, to demonstrate that runoff from each positively drained surface (for at least the first 5mm of rainfall) is intercepted through collection for reuse, infiltration, or storage within SuDS features, in compliance with the interception requirements of Standard 2 of the National Standards for SuDS.
- Evidence must be submitted to confirm that disposal of surface water via infiltration is not feasible through the provision of:
  - BRE65 infiltration testing results and trial pit location details must be provided
  - Ground water monitoring to determine the highest groundwater level (taking into account seasonal variations)
  - A detailed ground investigation report, including an assessment of potential ground contamination
- The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse/groundwater in accordance with Standard 4 of the National Standards for SuDS.
- Cross section and standard detail drawings should be provided for any SuDS, attenuation, conveyance or infiltration features and their components.

## INFORMATIVES

- All new drainage will need to comply with Building Regulations Part H.
- Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

## RELEVANT PLANNING POLICY & GUIDANCE

National Planning Policy Framework (NPPF) [NPPF December 2024 Link](#)  
*Planning and Flood Risk (Paras 170–182)*

Wiltshire Core Strategy – Adopted January 2015 [Wiltshire Core Strategy Link](#)  
Core Policy 67 requires that all new development must address flood risk from all sources and not increase flood risk elsewhere. It supports the use of Sustainable Drainage Systems (SuDS) and requires that developments demonstrate how surface water will be managed sustainably.

Wiltshire Local Plan (emerging) [Local Plan Review Link](#)  
Development must avoid high flood risk areas using the sequential approach. Proposals require a Flood Risk Assessment, Surface Water Drainage Strategy, and Groundwater Assessment where relevant. All schemes must include Sustainable Drainage Systems (SuDS), with major developments achieving a 30% reduction in runoff compared to greenfield rates, following the surface water discharge hierarchy.

Culverting and building over watercourses is discouraged, and natural drainage features should be retained or restored. Drainage strategies must ensure safety during extreme flood events (1-in-100-year + climate change) and provide safe access/egress. SuDS should also deliver biodiversity, amenity, and water quality benefits.

### Supplementary Planning Documents

Wiltshire Council Drainage Betterment Strategy (2024) [SPD Link](#)  
This technical guidance outlines expectations for surface water discharge hierarchy, attenuation, exceedance routes, water quality, and post-development monitoring.

Wiltshire Design Guide (March 2024) [SPD Link](#)  
Includes principles of good design, including integration of SuDS and flood resilience.

### Other Relevant Policies and Guidance

Planning Practice Guidance (PPG) – Flood Risk and Drainage [Guidance Link](#)  
Covers detailed expectations for flood risk assessments, SuDS design, discharge hierarchy, sequential testing and climate change allowances.

Wiltshire SFRA (2024) [SFRA Link](#)  
This document underpins the Sequential and Exception Test application and provides site screening evidence.

Section 19 Flood Investigation Reports [Section 19 Reports Link](#)  
These documents summarise investigations into significant local flood incidents and establish what caused the flooding, how authorities responded, and actions needed to prevent future floods.

National Standards for Sustainable Drainage Systems (SuDS) June 2025 [Guidance Link](#)  
Establishes mandatory criteria for runoff destination hierarchy, interception, flood resilience, water quality, amenity, biodiversity, and long-term maintenance for all new developments in England.

*SuDS Manual (CIRIA C753)*

This document sets out design principles, especially where attenuation, exceedance routing, and water quality are discussed.

Infiltration drainage design must be supported by ground investigations, including infiltration testing in accordance with *British Research Establishment (BRE) Digest 365 – Soakaway Design*, and groundwater level monitoring that accounts for seasonal variation.