

To:	Jonathan James	From:	Rahul Dixit
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Planning App Ref:	PL/2026/01361
Service Ref:	Drainage
Date:	14/09/2026

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	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Proposed Site Plan – Detail
- Proposed Site Plan – Overall
- Flood Risk Assessment & Drainage Strategy (Rev. G) (27/08/26)
- PL 2026 01361 SW Drainage Response (13/07/2026)
- Technical note - Summary response to drainage comments (13/07/26)

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 submitted a revised Flood Risk Assessment (FRA) and Drainage Strategy in response to the LLFA comments issued on 13/07/2026.

The applicant originally presented two drainage options – Option A (infiltration based strategy) and Option B (discharge to sewer). The infiltration testing results submitted in support of Option A are not compliant with BRE 365 and the applicant has therefore agreed to conduct further BRE 365 compliant infiltration testing and groundwater monitoring in February 2027. In order to progress the application in the interim, the applicant has progressed Option B to demonstrate that a technically viable drainage strategy does exist for the site. However, this is on the understanding that further infiltration testing and groundwater monitoring will be conditioned, and that this condition will also require the applicant to amend the drainage strategy to maximise discharge via infiltration, should the results of the infiltration testing demonstrate that this is feasible.

The applicant has now provided detailed hydraulic calculations for the proposed surface water drainage network for Option B, together with attenuation & SuDS feature sizing calculations. In addition, a detailed and clearly annotated drainage layout plan has been submitted for Option B, showing the proposed pipe networks & attenuation features are provided.

Whilst calculations have been provided for proposed network, soakaway and attenuation features with regards to option B, the current submission does not include sufficient design details for proposed Tree pits. These do not seem to be considered in the drainage calculations and it is unclear whether they are intended to provide storage for surface water.

The applicant has also provided correspondence from Wessex Water confirming that a connection to the existing 300mm public surface water sewer in Corn Croft Lane would be accepted in principle, subject to satisfactory evidence being provided that all higher priority discharge destinations within the drainage hierarchy have been fully explored and utilised to the maximum extent reasonably practicable. Wessex Water has further confirmed that any discharge to the public sewer must be restricted to a maximum rate of 1 l/s.

The applicant has provided further clarification regarding compliance with Standard S2 of the National Standards for SuDS for Option B. Drawing 13906-0053 shows that the proposed lined permeable block paved car park and permeable asphalt footways each drain only the areas directly above them, thereby providing interception storage. In addition, runoff from roof areas will be directed to a managed rainwater harvesting tank, which also provides interception storage at source.

Although the applicant has provided a schematic and quote for the rainwater re-use system they intend to install, the National Standards for SuDS states that in order to meet the criteria for interception storage, evidence must be provided that rainwater harvesting (RWH) systems have been designed in accordance with BS EN 16941. We would expect to see an assessment of rainwater yield and non-potable demand to support the proposed sizing of storage tanks.

An updated exceedance routing plan has been provided, incorporating kerb details along the eastern boundary of the development to ensure that overland flows are retained within the site. Previous concerns were also raised regarding the removal of a section of bund on the southern side of the site to form the access, which would allow overland flows to discharge onto the highway at a point further upstream than under the existing scenario. Currently, overland flows are conveyed eastwards along the bund before ultimately reaching the highway, with some flows also potentially discharging to the adjacent ditch. Following review, it has been concluded that overland flows entering the highway approximately 50m further upstream is unlikely to result in any material increase in flood risk. Particularly given that the applicant is seeking to mitigate the impact of the bund removal by installing a channel drain across the access road at the location where the bund section is to be removed.

RECOMMENDATION

Full Planning Application (ALDI Store)

No objection subject to the following conditions

No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, Non Statutory Technical Standards for SuDS and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

In order to discharge the above drainage, condition the following additional information must be provided:

1. Evidence should be provided to demonstrate that groundwater monitoring (accounting for seasonal variation) and infiltration testing (in accordance with BRE 365 guidance) has been undertaken on site. 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. Should the results of these investigations support the use of infiltration as a means of surface water disposal, the applicant will be required to revise the drainage strategy to ensure that discharge via infiltration is maximised.
2. The applicant should provide a complete set of hydraulic calculations for the proposed drainage system, prepared in accordance with the finalised drainage strategy, following ground investigations (Point 1). The model should include all proposed pipes, manholes, and SuDS features, with pipe and manhole references clearly matching those shown on the drainage drawings.
3. To demonstrate that rainwater harvesting (RWH) systems have been suitably designed, such that they meet the criteria and compliance requirements of Standard 2 of the National Standards for SuDS, the applicant should provide evidence that RWH systems are designed in accordance with BS EN 16941. Rainwater harvesting systems shall be designed in accordance with adopted best practice guidance and tools and demonstrate performance against an appropriate rainfall time series as set out in BS EN 16941. Reference should be made to the Environment Agency's Rainwater harvesting: regulatory position statement.

Outline Planning Application (Drive Thru)

No objection subject to the following conditions

No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, Non Statutory Technical Standards for SuDS and the National Standards for SuDS has been submitted to and approved in writing by the Local Planning Authority.

In order to discharge the above drainage, condition the following additional information must be provided:

1. Updated and clearly labelled drainage layout plan for finalised drainage strategy showing the pipe networks and any/all attenuation as well as SuDS features. The plan should show all pipe & node numbers referred to within the drainage calculations.
2. 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.