

To:	Development Management	From:	Drainage Team (Aayushi Kochar)
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Planning App Ref:	PL/2026/05008
Service Ref:	Drainage
Date:	04/09/2026

PROPOSAL

Full planning application

Erection of factory extension (for the storage of packaging associated with the existing egg packing use of the site)

SITE LOCATION

Packing Centre, Stonegate Farmers Ltd, Lacock Green, Corsham Road, Lacock, Chippenham, SN15 2NL

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Design Access Statement*
- *Existing & Proposed Elevations*
- *Existing & Proposed Floor Plans*
- *Existing & Proposed Site Plans*
- *List of Consultees & Neighbours*
- *Location Plan*
- *Neighbour Map*

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 seeks permission for the construction of a factory extension to provide additional storage for packaging associated with the existing egg-packing operation on site. The site is located within Flood Zone 1, and the proposed extension will be built on an area of existing hard surfacing. The application does not specify the proposed surface water drainage strategy, while no foul water drainage connection is proposed as part of the development.

The Design Access Statement states that the proposed development will be built on an area of existing hard surfacing, and the proposed development will therefore not exacerbate surface water flooding. Whilst we agree with the principle of this statement, we require additional information to assess how the site complies with the council's betterment strategy.

RECOMMENDATION

No objection subject to conditions

1. **The developer should provide the following information as part of future planning applications in accordance with Wiltshire Council requirements, NPPF, PPG and National Standards for SuDS:**
 - Evidence that the [surface water disposal hierarchy](#) has been applied for the proposed extended area in accordance with Standard 1.
 - Existing pre and post development runoff rates for the site, in accordance with Wiltshire Council's betterment policy update, which can be found [here](#).
 - 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 proposed drainage design provides a sufficient level of water treatment in line with simple index method outlined as part of National Standard 4.

INFORMATIVES

The site is located in source protection zone 2 (SPZ2) for drinking water. This will have an impact on infiltration-based SuDS. The drainage strategy should address water quality issues and comply with the [Environment Agency's approach to groundwater protection](#), which states that where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](#)"

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.

To aid in the development of compliant drainage strategies, the following are recommended without prejudice. These are based on the [National Standards for SuDS](#). We would recommend also utilising the best practice guidance within *The SuDS Manual*, and *Getting SuDS Right from the Start*.

Standard	Best Practice Considerations
Standard 1 – Drainage Hierarchy	- Retain and enhance existing natural drainage features where possible. - Use site layout to maximize opportunities for infiltration and above-ground conveyance. - Identify how communal rainwater harvesting can be utilised to help improve viability of inclusion. - Identify whole-life cost-benefits such as water bill reductions for implementing rainwater harvesting.
Standard 2: Interception	- Use green roofs, permeable paving, rain gardens, and bioretention to maximize interception. - Distribute source control features throughout the site for maximum effectiveness. - Provide a maintenance plan to ensure interception features remain effective.
Standard 3: Management of Extreme Rainfall and Flooding	- Use topographical surveys to identify and preserve natural overland flow routes. - Design SuDS features with freeboard and overflow routes. - Ensure safe access and egress during extreme events. - Consider overland flows originating from outside redline boundary - Consider how the drainage systems will perform in the event of blockage and failure
Standard 4: Water Quality	- Use vegetated SuDS (swales, ponds, wetlands) for effective pollutant removal. - Include forebays or sediment traps upstream of main SuDS features. - Provide a maintenance plan for regular removal of silt and debris.
Standard 5: Amenity	- Use gentle side slopes, accessible paths, and seating to make SuDS features usable and attractive. - Involve local communities in the design of SuDS spaces.

Standard 6: Biodiversity	• Design SuDS to create wetland mosaics, wildlife corridors, and habitat connectivity. • Consider how SuDS can help provide wider BNG benefits / credits to the site
Standard 7: Construction, Operation, Maintenance, Decommissioning, and Structural Integrity	• Plan for safe access for maintenance. • Include decommissioning plans for temporary features.