



Raymond Wicks <rayw1000@gmail.com>

RE: Advice Required Please

1 message

Developmentmanagement <Developmentmanagement@wiltshire.gov.uk>

Mon, Jan 12, 2026 at
1:49 PM

To: "rayw1000@gmail.com" <rayw1000@gmail.com>

Good afternoon,

For a proposal to subdivide the existing dwelling into two self-contained units (with no further works), please submit a Full Planning application (Change of Use) via the Planning Portal. (LBC is **not** required for **change of use alone** if no further alterations are proposed.)

It isn't possible for us to confirm whether the proposal is acceptable in principle outside the formal application process (or further pre-application advice). Acceptability will depend on the full submission, relevant planning policies, and any site-specific constraints assessed during determination.

The current NPPF (Dec 2024) confirms a proportionate approach to flood risk. Paragraph 175 makes clear that the sequential test is not required where a site-specific Flood Risk Assessment (FRA) demonstrates no built development or access/egress would be located in an area at risk from any source of flooding, now or in the future. For a change of use only, you should still provide a site-specific FRA using the latest EA data. Your note that the site is above EA 2D modelled flood levels and enclosed by 2m walls is helpful. Please ensure the FRA references current EA flood mapping and climate allowances and sets out safe access/egress arrangements (even though no works are proposed).

For what to upload, please refer to Wiltshire Council's Local Validation Checklist. Your application will be validated against that checklist, so include all items it specifies (application form/fee, ownership certificate, location/block plans, existing & proposed floor plans, proportionate Heritage Statement for the listed building, and a site-specific Flood Risk Assessment; other items may be triggered by site constraints such as Conservation Area, highways, nutrient neutrality, or Biodiversity Net Gain).

If you feel it would help to de-risk the submission, additional pre-application advice may be useful—especially if the site lies in a Conservation Area, the River Avon nutrient neutrality catchment, or has flood risk/parking sensitivities. We can then give more tailored, proportionate feedback on likely issues before you upload.

[Pre-application advice - Wiltshire Council](#)

https://www.wiltshire.gov.uk/media/17833/Local-Validation-Checklist-from-1-Sept-2025/pdf/Local_Validation_Checklist_1_Sept_2025.pdf?m=1755190377417

Kind regards,

Jamie Rayner
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Planning Technical Services

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From: Developmentmanagement <Developmentmanagement@wiltshire.gov.uk>
Sent: 12 January 2026 11:07
To: Rayner, Jamie <Jamie.Rayner@wiltshire.gov.uk>
Subject: FW: Advice Required Please

From: Raymond Wicks <rayw1000@gmail.com>
Sent: 12 January 2026 11:04
To: Developmentmanagement <Developmentmanagement@wiltshire.gov.uk>
Subject: Advice Required Please

Dear Sirs

I intend to submit a planning application for a material change of use via the Planning Portal at the end of this week and it would be very helpful if you could, please, advise me in regard to the following very brief questions, which I have underlined for ease of reference.

It is my intention to apply for planning permission to split an existing building into two separate properties.

As I understand it, the proposal for this split of the properties is designated as a 'Material Change of Use' by reason of sections 55(1) and (3)(a) of the Town & Country Planning Act 1990. Therefore, according to these sections, the application I wish to make is for a material change of use. Because there are no alterations or extensions, that is all the application will be for.

The smaller of the properties was built as in 1854 as an extension to the larger, and the properties were totally physically separated under Listed Building Consent permission, reference PL/2022/06040, so that they are both already totally self-contained.

There are no extensions to either property and no alterations are involved in the split. The property is listed but, because there are no alterations or extensions involved in the split, I am told that this means no Listed Building Consent is required?

Pre-application advice was given in 2022 to a wider scheme of alterations, which has since been refused. However, the application also covered the circumstances where there was only a split with no alterations and the advice given was as follows:

Summary of Officer View

For the proposals to be considered acceptable in principle, they would need to be amended to be change of use with only internal and external alterations to appearance without extensions.

The current proposals do not involve any alterations whatsoever, so are presumably now acceptable in principle?

In regard to flood risk, the planning officer continued:

Flood Risk Assessment were the scheme revised to change of use only:

'Were it possible to convert the property without extensions (only including alterations to the external appearance), then a sequential test would not be required, although a site-specific FRA would be required in accordance with paragraph 168 of the NPPF:

'168. Applications for some minor development and changes of use⁵⁶ should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 54.

'For example, I note the pre-application refers to the 1854 extension being able to be converted without alterations, in which case were this element submitted as a stand-alone scheme then a sequential test would not be required, and a site-specific FRA would be.'

The example given by the Planning officer is exactly what is now being applied for, i.e. that the 1854 extension is split off as a stand-alone scheme without alterations to any part of the two properties thus formed.

I note that paragraph 168 of the National Planning Policy Framework is numbered 176 in the 2014 version, but appears unchanged, as follows:

Applications for some minor development and changes of use [62] should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.

[62] This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park

Could you please confirm, therefore, that the advice given above, still applies, so that a sequential test is not required, although a site-specific FRA would be?

Incidentally, the Site-specific Flood Risk Assessment shows that the site is at no risk of flooding because it is above the highest level of the EA 2D Modelled Flood Water Plain Water Levels provided by the Environment Agency, and is also entirely enclosed at the rear by brick or stone walls to a height of no less than 2 metres.

Given there are no alterations, and aside from the Site-specific Flood Risk Assessment, could you also confirm if the following are still necessary?

Historical Building Appraisal
Statement of Heritage Significance
Design and Access Statement
Noise Assessment
Biodiversity Assessment
Nutrient Neutrality Assessment

Finally, are there any other matters that the application should address?

I should like to make the application as soon as possible and so look forward to hearing from you at your earliest opportunity.

Yours sincerely

R Wicks

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