

To:	Development Management	From:	Rahul Dixit
------------	------------------------	--------------	-------------

Planning App Ref:	PL/2022/02557
Service Ref:	Drainage
Date:	02/02/2026

PROPOSAL

Full application to convert and extend Mill House to create 10 dwellings (5x3bedroom houses and 4x1 bedroom flats and 1x2 bedroom flat), an increase in 6 dwelling units on Mill House from application 17/00200/FUL. Regularisation of Clarks Mill development for 16 apartments and alterations

SITE LOCATION

Clarks Mill and Mill House, 58 Stallard Street, Trowbridge, Wilts, BA14 8HH

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

- Location Plan
- Proposed Block Site Plan
- Design, Access and Heritage Statement
- Clarks Mill – Proposed Floor Plan
- Clarks Mill – Proposed Elevation
- Mill House – Proposed Floor Plan
- Mill House– Proposed Elevation
- Flood Risk Assessment

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 has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

This planning application follows earlier approvals granted under references 17/00200/FUL, and 20/00186/VAR. The previously issued consents from 2017 and 2020 authorize both the alterations and the change of use of Mill House to form four self-contained C3 residential dwellings with conditions. Flood resilience measures and emergency plan for Mill House & Clarks Mill were requested as a condition under both the approved planning applications.

Application PL/2023/00092 has been submitted to discharge the conditions relating to flood resilience measures and emergency planning for both buildings and is currently under consultation. As all matters concerning flood resilience and emergency response arrangements will be addressed and assessed under this separate application, so we have no comments with regards to this.

We acknowledge that the development layout recreates the original footprint of the building prior to its part demolition. However, the applicant is requested to provide a clear outline of the existing surface water drainage strategy for the site, confirming how runoff is currently managed and whether this arrangement is intended to be retained, modified, or replaced as part of the proposed development. They should also demonstrate whether the existing drainage system has sufficient capacity to accommodate any increase in surface water runoff.

It is noted that the EA has objected on the grounds of an insufficient FRA for the site, namely that the most up to date flood modelling has not been utilised. The LLFA supports the EA's objection, and we would expect the applicant to address and satisfy the EA's requirements before we can determine whether the proposed finished floor levels are appropriate. The EA has also raised concerns regarding the flood wall due to lack of clarity; however, the LLFA understands that no such flood wall now forms part of the development, but the applicant should confirm this position.

RECOMMENDATION

No objection subject to the following conditions

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, National 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:

A drainage strategy is required to support this application. The surface water drainage strategy should include/demonstrate the following in accordance with the [National Standards for SuDS](#):

- Existing brownfield runoff rates for the site.
- With regards the control of surface water discharges from brownfield sites, Wiltshire Council requires post development discharges to be as close as reasonably practicable to greenfield runoff for both peak flow and volume. For more information refer to Wiltshire Council's betterment policy update which can be found [here](#).
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- The applicant should provide evidence confirming that the proposed finished floor levels are at a minimum of 300 mm above the maximum predicted 1-in-100-year flood level, inclusive of the applicable climate-change allowance. Updated finished floor level details must be derived from the most up-to-date flood-modelling data to ensure accurate flood levels.
- A clearly labelled drainage layout plan should be provided, illustrating the full pipe network and any SuDS features, and clearly distinguishing between the existing drainage infrastructure and the proposed network arrangements.
- In accordance with Standard 1 of the National Standards for SuDS, the applicant shall submit any third-party agreements for discharge to their system (temporary and permanent) including consent to discharge into an ordinary watercourse.
- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.

INFORMATIVES

All new drainage will need to comply with Building Regulations Part H.

It is noted that the Environment Agency's [standing advice for minor extensions and vulnerable developments](#) applies.

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.

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.