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| <b>To:</b> | Steven Sims | <b>From:</b> | Drainage (Barney Taylor) |
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| <b>Planning App Ref:</b> | PL/2026/00427 |
| <b>Service Ref:</b>      | Drainage      |
| <b>Date:</b>             | 24/02/2026    |

## PROPOSAL

*Flood defence works to include the formation of a new pedestrian entrance to the courtyard, adjustments to the entrance of Flat 14, and alterations to lower level windows. Works will also include the removal of sections of walling to facilitate the new openings.*

## SITE LOCATION

*Abbey Mill, Church Street, Bradford On Avon, BA15 1HB.*

## SUMMARY OF THE CONSULTEE POSITION

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

## APPLICATION DOCUMENTS REVIEWED

- *Application Form*
- *Design, Access and Heritage Statement*
- *Existing Flood Egress Entrance and Floor Plans*
- *Existing Site Plan*
- *Flood Defence Entrance – proposed*
- *Flood Defence Window – Proposed*
- *Location Plan*
- *Proposed Flood Egress Entrance and Floor Plans*
- *Proposed Flood Egress Entrance*

## 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 not 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 documents provided and we do not take any responsibility for incorrect data or interpretation made by the authors.

The LLFA would recommend that the EA are consulted on this application.

**RECOMMENDATION: no objection.**

The drainage team have no objection to the proposals as there is no increase in impermeable area, and the drainage arrangements at the site remain as existing.

The applicant is referred to the informatives section regarding the requirements for an Environmental Permit for works adjacent to the River Avon.

## INFORMATIVES

An environmental permit is required for any works within 8m of a main river. Consult the [Environment Agency's main river map](#) to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the [website](#).

## 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.