

To:	Alex Edge	From:	Drainage Team
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Planning App Ref:	PL/2026/00252
Service Ref:	Drainage
Date:	17/02/2026

PROPOSAL

Full planning permission for proposed change of use from storeroom / outbuilding to residential (one bedroom flat) + added dormer.

SITE LOCATION

Longfield House, Store Buildings At, Mortimer Street, Trowbridge, BA14 8BG

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

- Application Form
- Design and access statement
- Existing plans and elevations
- Flood risk assessment
- Site location plan and block plan
- Proposed plan and elevations
- Proposed flat parking allocation

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.

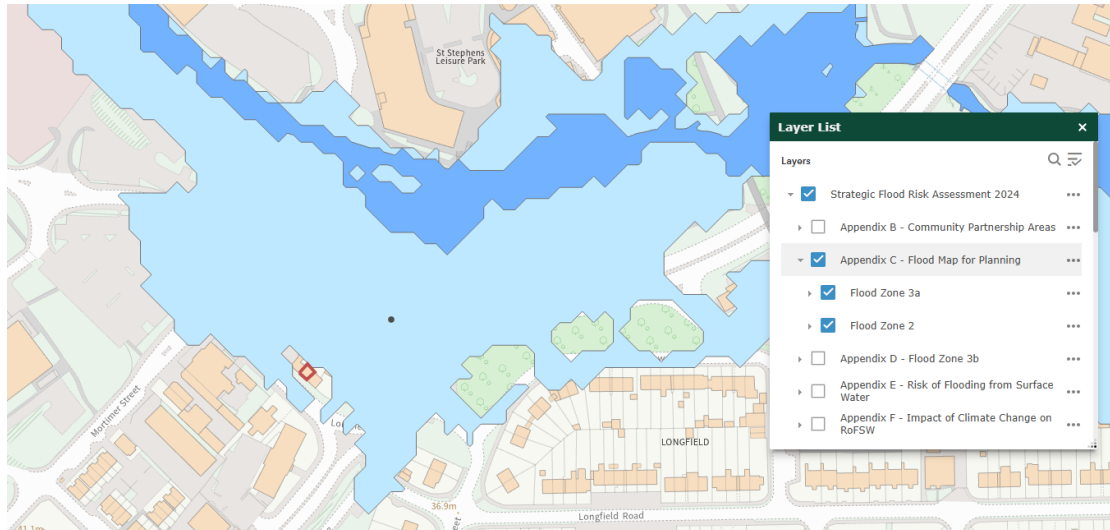
Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

Assessment

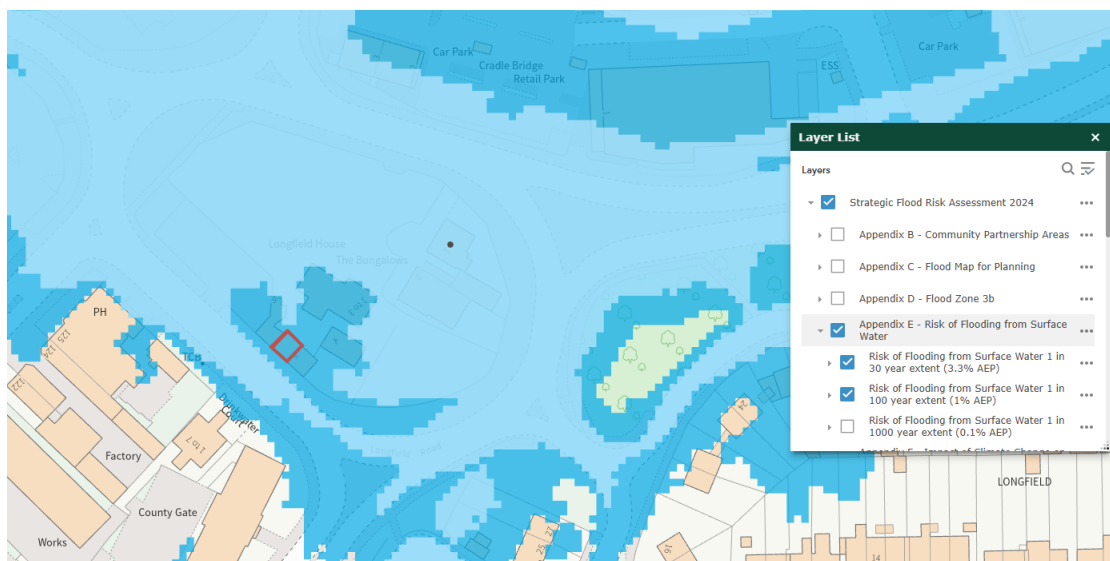
The application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors. The developer, or agent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

checking of the design, calculations and details contained in the FRA and additional submitted information.

Although the building is located within a low-risk fluvial area (Flood Zone 1), the surrounding land falls within Flood Zone 2 and is also affected by moderate surface-water flood risk at the 1-in-100-year extent, indicating that surface water may accumulate or flow across the access routes during periods of intense rainfall.



The site has a medium level of risk from surface water flooding and the road located in front of the site falls within the 1 in 100-year flood extent.



The proposal seeks to convert an existing outbuilding into a one bedroom residential unit, including the addition of a new dormer and first floor accommodation. The Flood Risk Assessment (Section 6.39) confirms that the development retains the existing building footprint and does not introduce any new hard surfaced areas or parking provision. It further states that surface water will continue to be managed through the existing drainage system, as there is no increase in impermeable area or runoff.

The application includes only a basic indicative safe access and egress route and indicates an intention to prepare a Flood Warning and Evacuation Plan. However, no detailed assessment of flood depths or hazard levels along the access routes has been provided.

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 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:

- The access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).
- Evidence that the finished floor levels should be at minimum of 150mm above the maximum predicted 100-year flood level.

INFORMATIVES

- The EA's standing advice for minor extensions will apply.
- In line with the NPPF and National Standards for SuDS, the applicant should seek to use SuDS wherever practicable as part of the surface water drainage strategy.

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.