

To:	Andrew Thomas	From:	James Playfair
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Planning App Ref:	PL/2026/02177
Service Ref:	Drainage
Date:	27 May 2026

PROPOSAL

Prior Approval Part 3, Class MA: Commercial, business and service uses to dwellinghouses:
Conversion of building into 6 flats comprising 3 x 3 beds and 3 x two beds - No external changes to the external facades is anticipated

SITE LOCATION

Boreham Mill, Bishopstrow Road, Warminster, Wiltshire, BA12 9HQ

SUMMARY OF THE CONSULTEE POSITION

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

APPLICATION DOCUMENTS REVIEWED

- Boreham Mill Planning covering letter 23 03 2026
- 2500_P100 V1 Proposed Ground Floor Plan
- 2500_EX100 Existing Ground Floor Plan
- 2500_EX010 Location and Site Plan
- 2500351-ENV-S1-SW-TR-C-0001 R1 (Redacted) - 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.

The grounds are mainly hard landscaped containing 22 existing parking spaces with a grass area to the west of the building.

The property is accessed off Bishopstrow Road with a wide splay onto the highway. The proposal is to convert the building into 6 flats comprising 3 x 3 beds and 3 x two beds.

No external changes to the external facades is anticipated. All the changes are within the existing building envelope.

Assessment

A review of the EA RoFRS (Figure 1) shows that when considering the impacts of climate change, the flood polygons overlap the building footprint indicating that the site will be at risk of fluvial flooding in the future and would be completely cut off by Fluvial Flooding during an event.

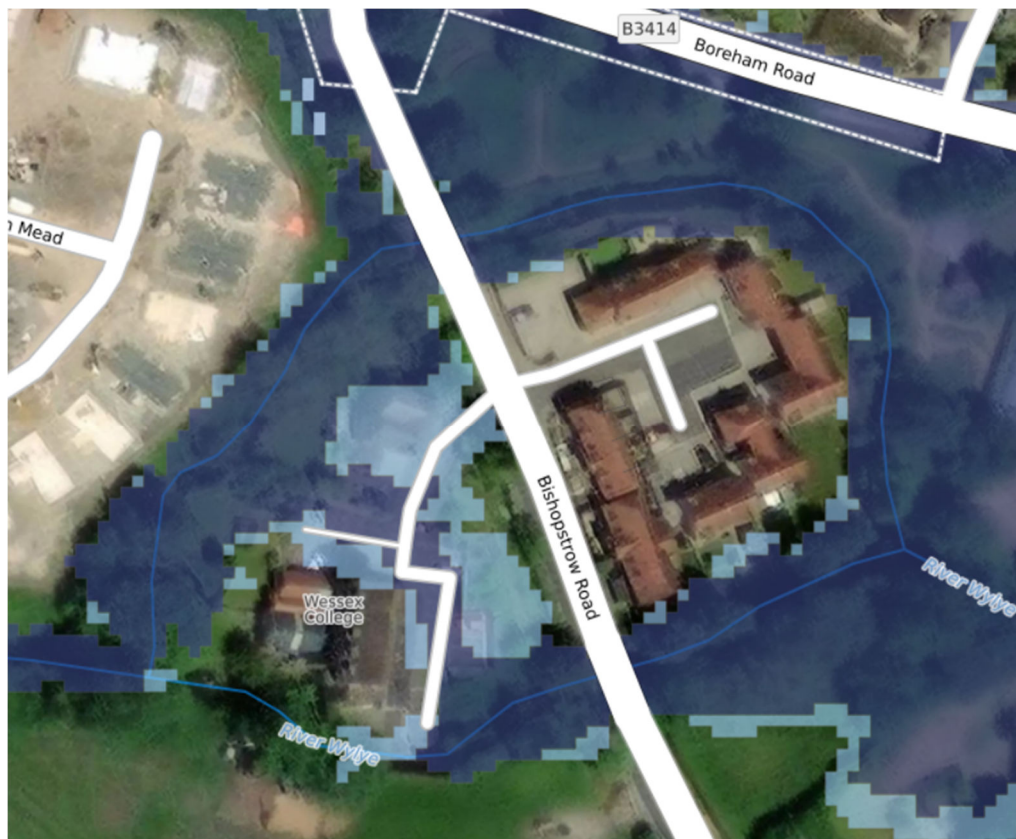


Figure 1

As a result of the increase in flood vulnerability (due to the change to residential properties), an FRA has been completed

Surface Water Drainage

Although there are no proposals to increase the impermeable area on site, the implementation of SUDs has been proposed

The proposed drainage network is to consist of porous paving and subsurface storage serving the proposed driveway and roof. This shall then be connected to a flow control chamber fitted with a Hydro International Hydrobrake Optimum flow control unit.

The drainage Layout (Page 89) of the FRA) shows roof runoff collected by water butts and soakaways and the paved surface served by permeable paving that drains to a tanked system. The tank is emptied at a rate of 2l.s to a manhole which then pumps both treated foul and surface water to the watercourse.

Flood Resilience Measures

The proposed mitigation measures include the installing a fully detailed waterproofing system and flood doors, raising electric circuits above the maximum design storm level, elevating kitchen electricals and white goods above the maximum design storm level, utilising of impermeable floors and tiled, impermeable walls up to the maximum design storm level to ensure that the property can be redeemed after stormwater ingress and sealing entry points with an impermeable sealant.

Safe egress

A flood hazard assessment has been undertaken and determined that the access/egress route would likely fall into the “*Danger for most*” category with respect to flooding from rivers and the safe access and egress cannot be maintained from the site onto Bishopstrow Road for the general public but is acceptable for emergency vehicles.

Residents and future residents should be fully aware of the necessary evacuation procedures; where evacuation is possible. This should include drawing their attention to the site specific flood action plan, which should be produced in accordance with the EA Personal Flood Plan (LIT 4112), the EA “Would you know what to do in a flood?” 3 point plan. The emergency plan should be further discussed with the emergency services so that they can understand the extent of flooding and advise on what further procedures should be followed. It is also recommended that the dwelling subscribes to the EA’s flood warning service as a method of mitigation for anticipated storms.

Site users should be advised to prepare an evacuation bag in case of a flood event. This should be prepared with due consideration to the National Flood Forum Emergency Flood Kit.

The LLFA is of the opinion that the applicant has not demonstrated how they have complied with PPG para 047 ([Flood risk and coastal change - GOV.UK](#)) in relation to safe access / egress

Access considerations should include the voluntary and free movement of people during a ‘design flood’, as well as the potential for evacuation before a more extreme flood, considering the effects of climate change for the lifetime of the development. Access and escape routes need to be designed to be functional for changing circumstances over the lifetime of the development.

Specifically:

Access routes should allow occupants to safely access and exit their dwellings in design flood conditions. Vehicular access to allow the emergency services to safely reach the

development during design flood conditions will also normally be required in addition to the requirements of the building regulations.

Wherever possible, safe access routes should be provided that are located above design flood levels and which avoid flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc. to make it safe.

Where a failure of flood risk management infrastructure would result in flooding with a speed-of-onset that would not allow sufficient time for safe access and escape, an internally accessible place of safety, capable of accommodating the likely number of occupants or users of the proposed development should also be provided

RECOMMENDATION

Holding objection as further information required

At this stage, a full assessment cannot be completed due to insufficient information. The following documents/information are required to enable a proper review of the drainage and flood risk aspects of the proposal:

- As stated in the FRA, A structural survey will be required of the building to analyse the suitability of the external walls and of the entirety of the structure to confirm that it is of sufficient construction to withstand standing and moving flood waters, with associated debris.

Standard 3: management of extreme rainfall and flooding

- The applicant is to provide evidence as to where the stated 0.5m/s velocity used to determine the hazard risk has been derived - The velocity has been based on the 2017 surface water maps and not the current (2025) fluvial flood maps
- If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.

Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity

- As access to the site is predicted to flood, an emergency plan must be agreed with Wiltshire Council and the emergency services (Dorset and Wilts Fire and Rescue) on the acceptability of the emergency plans and the escape routes before the LLFA can accept the proposal. Guidance on the preparation of an emergency plan can be found [here](#).

INFORMATIVES

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.