



MTD CONSULTING

**THE OLD SMITHY,
HOLLOWAY**

**FLOOD RISK
ASSESSMENT**

Mr & Mrs Webb

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1. INTRODUCTION

Introduction

- 1.1. MTD Consulting has been commissioned by the client to provide a Flood Risk Assessment report to support a planning application relating to the creation of a new garage on the footprint of existing sheds. This report has been prepared in accordance with the requirements set out in the National Planning Policy Framework (NPPF), the associated Planning Policy Guidelines (PPG) and local policy requirements.
- 1.2. The main purpose of this site-specific Flood Risk Assessment is to provide sufficient flood risk information to support a planning application, as such the level of detail included is commensurate and subject to the nature of the proposals.

Objectives & Scope

- 1.3. The objective of this report is:
- Review all sources of flood risk and the sequential location of the site.
 - Assess applicability of the development proposals against flood risk.
- 1.4. The scope of this Flood Risk Assessment is to support a planning application.

Limitations

- 1.5. The general limitations of this report are that:
- MTD Consulting Ltd has prepared this Report for the sole use of the Client in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by MTD Consulting Ltd. This Report is confidential and may not be disclosed by the Client nor relied upon by any other party without the prior and express written agreement of MTD Consulting Ltd.
 - A number of data sources have been used in compiling this report. Whilst MTD Consulting believe them to be trustworthy; it is unable to guarantee the accuracy of the information that has been provided by others.
 - This report is based on information available at the time of preparation. There is potential for further information to become available, which may create a need to modify conclusions drawn in this report.
 - The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by MTD Consulting Ltd has not been independently verified by MTD Consulting Ltd, unless otherwise stated in the Report.

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2. SITE CONTEXT

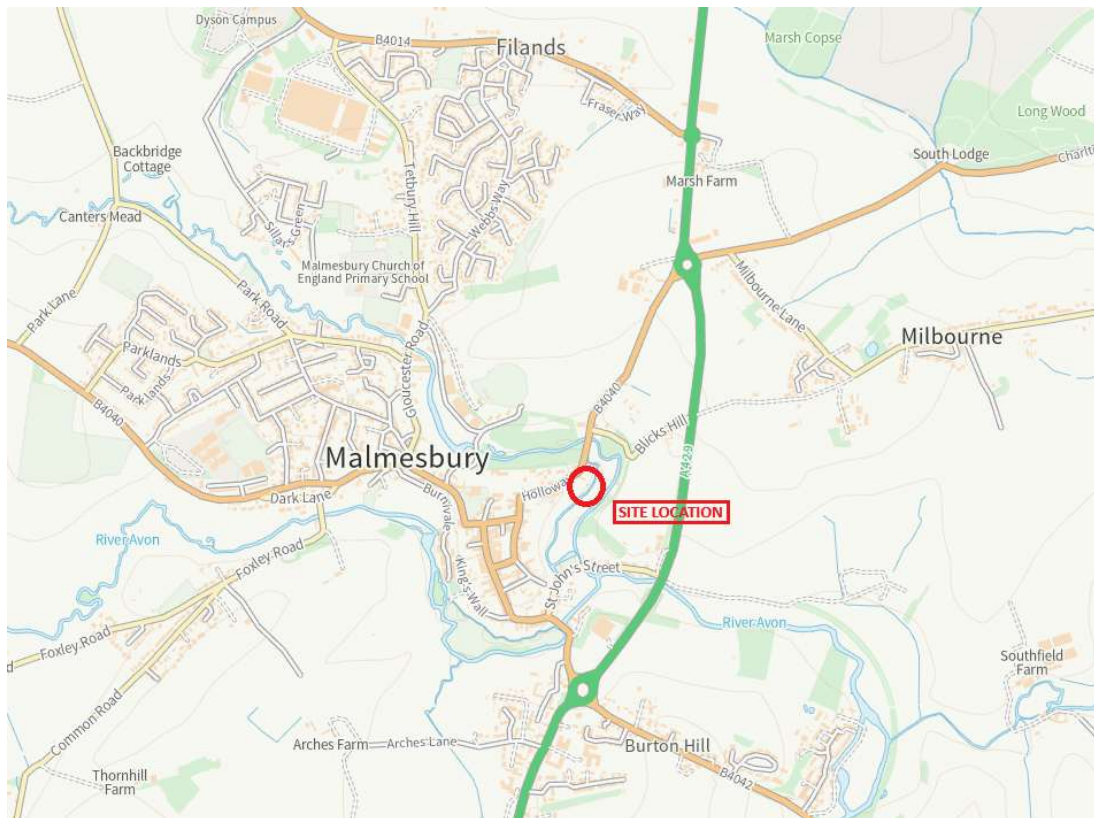
Development Proposals

- 2.1. The development proposals, in which this Flood Risk Assessment is written for comprises a new oak framed garage on the footprint of existing sheds located at The Old Smithy, Holloway, Malmesbury, Wiltshire, SN16 9HX
- 2.2. Refer to the development proposals in **Appendix A**.

Site Location

- 2.3. The site is located as per **Figure 1**.

Figure 1 : Site Location Plan



Topography

- 2.4. Refer to Appendix B for a topographical survey of the site.
- 2.5. The site has a general fall to the east. The access to the site is at a level of 72.350mAOD and the low point adjacent to the watercourse is 69.470mAOD.
- 2.6. The existing outbuildings are assumed to have a FFL of 69.910mAOD.

Hydrology

- 2.7. The site falls within the catchment of the River Avon (Tetbury Branch) which is located to the east of the site.

Geology

- 2.8. The British Geological Survey (BGS) mapping indicates the site to be underlain by solid geology of the Forest Marble Formation – Mudstone. The site is not underlain by superficial geology.
- 2.9. No specific site investigation has been undertaken to inform the geology of the site.

Existing Drainage

- 2.10. Surface water drainage serving the existing site discharges to the east to Mill Leat which is a braided section of the River Avon (Tetbury Branch)



3. FLOOD RISK

- 3.1. Inappropriate development in flood risk areas could pose significant risks in terms of personal safety and damage to the property for the occupiers of the development or for people elsewhere. The approach taken in the assessment of flood risk at the planning stage is set out in national, regional and local planning policy and associated guidance. This section summarises the key policies and guidance relevant to the proposed development.

Planning Policy

National Planning Policy Framework (NPPF)

- 3.2. The National Planning Policy Framework (NPPF) was first published in 2012, with a subsequent revision by the Ministry of Housing, Communities and Local Government amended in July 2018, February 2019, July 2021 and September 2023 with the most recent update being made in December 2024.
- 3.3. The NPPF is the primary source of national planning guidance in England, setting out the Government's planning policies for England, and how they are expected to be applied by local councils.
- 3.4. 'Chapter 14: Meeting the challenge of climate change, flooding and coastal change' outlines the guiding principles for managing flood risk as part of the planning process.
- 3.5. The Planning Practice Guidance (PPG) is also available online and was last amended in December 2024. The Planning Practice Guidance includes a series of tables that define flood zones, the flood risk vulnerability classification of development, land uses, and 'compatibility' of development within the defined flood zones.
- 3.6. A Flood Risk Assessment is to be completed in line with the guidance and requirements of the NPPF and Planning Practice Guidance.
- 3.7. It is necessary to consider the potential consequences of flooding from all sources, which include directly from pluvial flows, rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

Local Planning Policy

Wiltshire Core Strategy – Adopted 2015

- 3.8. The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026.
- 3.9. In respects of flood risk, Core Policy 67 is written as –

Core Policy 67

Flood Risk

Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice



All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

Wiltshire Council Strategic Flood risk Assessment Level 1 May 2019

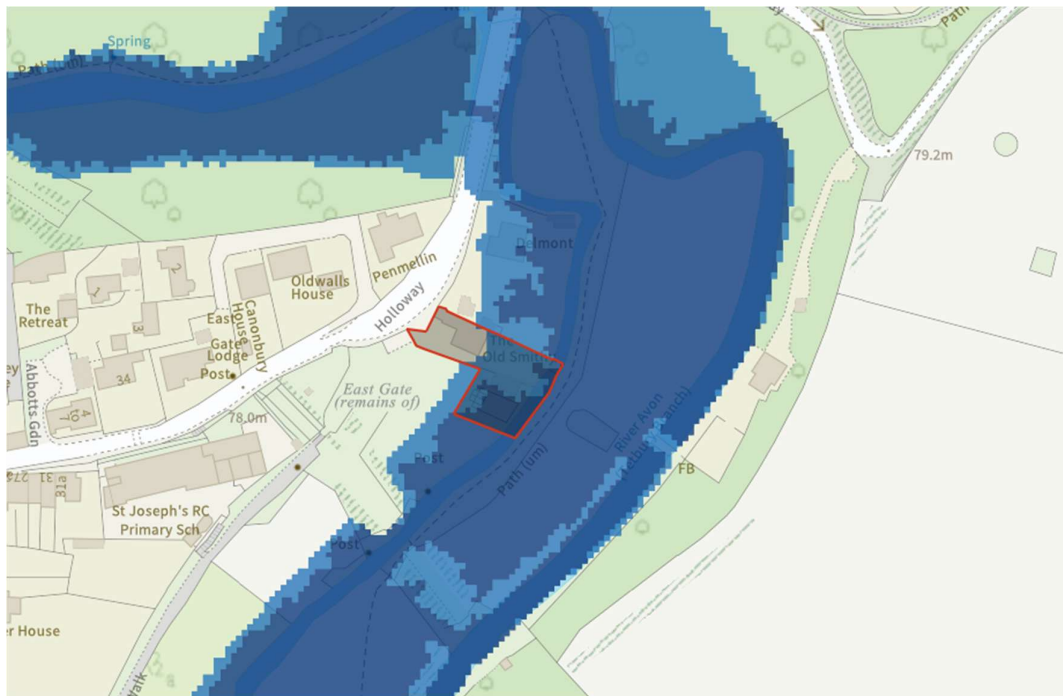
- 3.10. The Wiltshire Council Strategic Flood Risk Assessment (SFRA) level 1 sets out the current flood risk policy and emerging guidance (At the time of publication), reviews all historic and current flood risk data and provides comprehensive mapping of sources of flood risk and factors that influence flood risk.

Sources of Flood Risk

Fluvial Flooding

- 3.11. **Figure 2** provides an extract of the Flood Risk Map for planning which identifies that the site is located in Flood Zone 3, 2 & 1. The footprint of the existing shed in which the garage is proposed is shown to be within flood zone 2.
- 3.12. Section 4 of the report will review fluvial flood risk further.

Figure 2: Environment Agency's Flood Map for Planning



Pluvial Flooding

- 3.13. The Environment Agency's Risk of Flooding from Surface Water Map indicates where surface water may be expected to flood or pond. Surface water flooding happens when rainwater does not drain away through the normal drainage systems or soak into the ground but lies on or flows over the ground instead.
- 3.14. **Figure 3** shows the extent of surface water flood risk as per the Environment Agency mapping. The mapping identifies that the site is not affected by surface water flood risk.

Figure 3: Environment Agency - Risk of Flooding from Surface Water Map 1000yr



Flooding from Groundwater

- 3.15. There are no records of groundwater flooding in the site or the surrounding area.
- 3.16. The Wiltshire Council SFRA identifies that the site lies in an area defined as having negligible risk from groundwater flooding.

Flooding from Overwhelmed Sewers and Drainage Systems

- 3.17. There are no recorded flooding incidents of sewer flooding.

Flooding from Artificial Sources

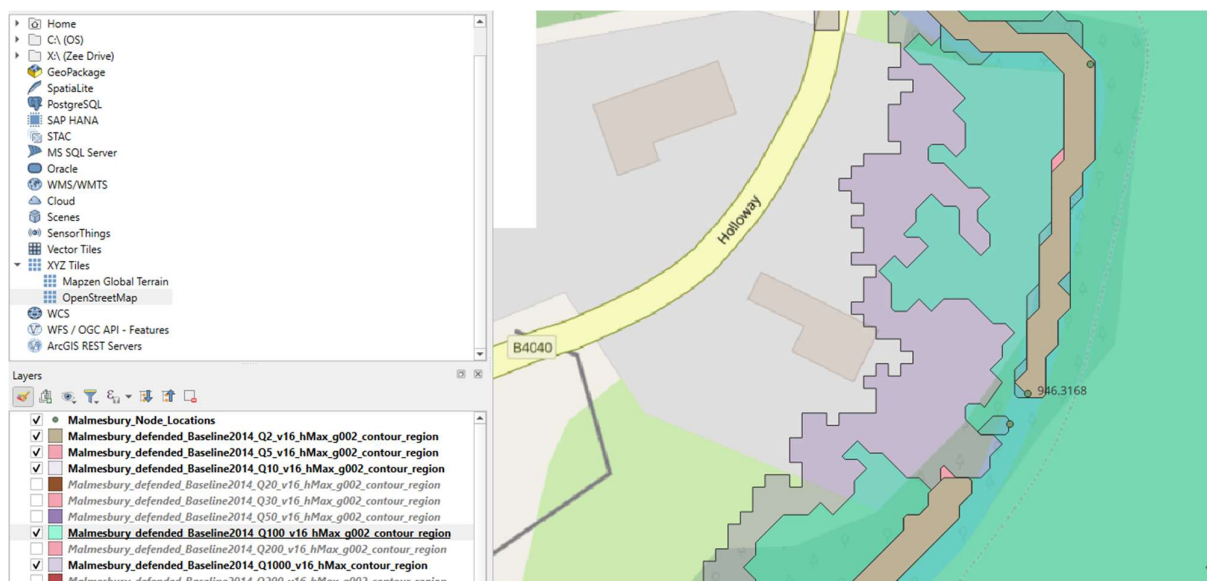
- 3.18. The site is not in an area at risk of flooding from artificial sources such as canals or reservoirs.

4. FLUVIAL FLOOD RISK REVIEW

Environment Agency data

- 4.1. The Environment Agency have provided product 5 & 6 data for use within GIS software. The EA have not provided Product 4 site specific data for use.
- 4.2. All flood data is provided in reference to the outputs of the flood data when viewed via GIS Software. Specifically, the nodes that represent the site are Section 12a (located to the north of the footbridge in **Figure 4**) & Section 12aD (located to the south of the footbridge in **Figure 4**).
- 4.3. Figure 4 below identifies the site, node locations and flood extents as modelled.

Figure 4: Environment Agency – Product 6 GIS



Published Flood Depths

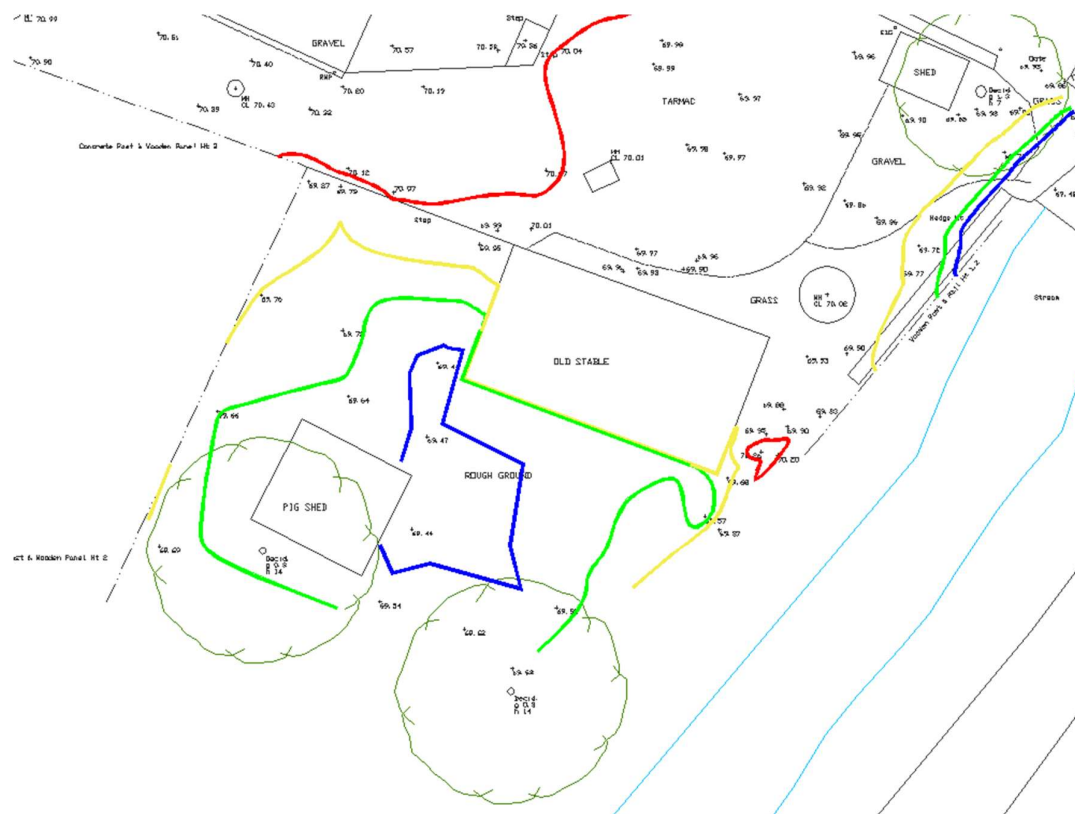
- 4.4. **Table A** summarises the flood level data in the vicinity of the site.

Table A: Node flood level data

Malmesbury 2016 - table created from MNPM mapedit deliverables - HS May 2017

Node Point Name	2 year	5 year	10 year	20 year	30 year	50 year	100 year	200 year	1000 year
	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)	Level Value (mAOD)
Section12a	68.8	68.97	69.09	69.4	69.48	69.6	69.73	69.83	70.1
Section12aD	68.8	68.95	69.08	69.25	69.34	69.5	69.66	69.77	70.04

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- 4.7. **Table B** identifies the flood level of node Section12aD in relation to the FFL of the development proposals.

Table B: Flood depth against FFL

Section12aD	50% AEP (2yr)	20% AEP (5yr)	10% AEP (10yr)	5% AEP (20yr)	3.33% AEP (30r)	2% AEP (50yr)	1% AEP (100yr)	0.5% (200yr)	0.1% AEP (1000yr)
FFL	69.91	69.91	69.91	69.91	69.91	69.91	69.91	69.91	69.91
Flood Level (mAOD)	68.8	68.95	69.08	69.25	69.34	69.5	69.66	69.77	70.04
Flood depth	-1.11	-0.96	-0.83	-0.66	-0.57	-0.41	-0.25	-0.14	0.13

- 4.8. **Figure 5** and **Table B** identify that the footprint of the existing outbuildings is located in Flood Zone 2 and affected by the 1000yr storm event only. The depth of potential flooding is 130mm.

Flood Defences

- 4.9. The Environment Agency flood data does not identify any existing flood defences

Historic Flooding

Environment Agency

- 4.10. The Environment Agency open source data identifies a historic fluvial flooding outline that is mapped over the proposed development site (does not reach the main dwelling)– no specific details are provided in relation to this flood event.

SFRA

- 4.11. The Wiltshire SFRA identifies a historic fluvial flooding outline that is mapped over the proposed development site (does not reach the main dwelling) – no specific details are provided in relation to this flood event.

Local Press

- 4.12. There are many reports in the press of flooding within Malmesbury. The recorded events do not specifically show the development clearly however flooding around the local vicinity is recorded.

Fluvial Flood Risk conclusion

- 4.13. The published flood levels via the Product 6 data identifies that the site would be affected by the 1000yr storm and as such is located in Flood Zone 2. Lesser events will not rise to a level that will affect the FFL of the development however will be adjacent to the structure on the southern side where levels are significantly lower.
- 4.14. Flood depth during the 1000 year event will be to a depth of 130mm.



5. SEQUENTIAL AND EXCEPTION TEST

5.1. Paragraph 172 of the NPPF states –

All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- (a) applying the sequential test and then, if necessary, the exception test as set out below;*
- (b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- (c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- (d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*

5.2. Paragraph 174 of the NPPF states –

Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.

5.3. Paragraph 176 of the NPPF states –

Applications for some minor development and changes of use 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

5.4. The proposed development is a minor development (measuring 72m² - the NPPF classify minor development as extensions with a floor space of less than 250m²) as such the application of the sequential test is not required where a site specific flood risk assessment is provided.



6. FLOOD RISK MANAGEMENT

Summary of pre development flood risk

- 6.1. A summary of the potential risk from all sources of flooding associated with existing conditions pre-development is shown in **Table C** below.

Table C: Pre-development Potential Flood Risk from All Sources of Flooding

Flood Source	Potential Risk				Description
	Very Low	Low	Medium	High	
Watercourses				X	The site is located in Flood Zone 2
Surface Water		X			RoFSW does not affect the site
Groundwater		X			There are no records of groundwater flooding
Overwhelmed Sewers		X			There are no records of existing issues
Artificial Sources	X				The site is unaffected

Flood Risk Vulnerability

- 6.2. Annex 3: Flood Risk Vulnerability Classification categorises different types of development according to their vulnerability to flood risk. Table 2: Flood risk vulnerability and flood zone 'compatibility', maps these vulnerability classes against the flood zones to indicate where development is appropriate and where development should not be permitted.

Figure 6: Extract of NPPF Annex 3: Flood Risk Vulnerability Classification

Less vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.
- Car parks.

- 6.3. With reference to Annex 3, the proposed garage is classified to be less vulnerable.
- 6.4. With reference to NPPF Table 2, the development is appropriate in Flood Zone 1, 2 & 3a



Figure 7: NPPF Table 2: Flood Risk Vulnerability and Flood Zone 'Compatibility'

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Minimum Ground Floor Levels

- 6.5. The FFL of the existing outbuildings is 69.910 mAOD. It is proposed that this level is retained such that it ties in with the surrounding site and levels and does not require ground reprofiling to reach an elevated level. Ground reprofiling would raise levels and cause a loss in the functional flood plain therefore increasing downstream flood risk.

Flood Compensation

- 6.6. The footprint of the building is located in Flood Zone 2 and covers an area of 72m². The existing building is located in Flood Zone 2 therefore there is no change in how the site reacts and accommodates a flood event.
- 6.7. The proposed works are to allow for the flood event within the garage and enable flood flows to pass through the structure. This proposal entails that flood compensation is not require

Flood Resistance and Resilience Measures

- 6.8. The following flood resilient and resistant measures are proposed for implementation to the proposed works :

- All electric metres will be installed a minimum of 1m above FFL
- All electrical cabling is to be fed down from the ceiling with all electrical outlets being a minimum of 1m above FFL
- Storage of materials / perishable items should be on racking that is raised 150mm higher than the FFL
- Allow air bricks / voids to allow flood flows through the structure
- Oak framed construction to be on raised plinths 300mm above the FFL

Flood warning procedures

- 6.9. The site is located within the Tetbury Avon at Malmesbury flood warning area. The owners are already signed up to receive flood alerts.



Decision Making

- 6.10. If a flood warning has been received relating to the River Avon, people will need to decide what actions they or others now have to take.
- 6.11. Decision making is to be made by the owner who is assumed to be responsible for all occupants of the site.

Protection of Property

- 6.12. In advance of a flood warning, occupants are to be aware of the actions that can be implemented to protect the structure in advance of a flood occurring. These actions should occur prior to the flood impacting the structure or restricting evacuation procedures or routes.
- 6.13. Structure protection activities may include:
 - 1. Shutting off mains gas, water and electricity supplies (where applicable).
 - 2. Ensuring items stored in the garage are located on storage / racking located above the anticipated flood level
 - 3. Moving material-handling equipment, chargers, vehicles and trailers to higher ground

Flood action plan

- 6.14. The following provides information in the event of flood or in the event of a forecasted flood event.

Refuge & Evacuation

- 6.15. The development is a garage and there is no habitual space. As such it is assumed that there would be no one within the structure for a long period of time.
- 6.16. Should any flood warning or event occur whilst the garage is being utilised, the person / persons should leave the garage and reside in the main dwelling house.
- 6.17. No additional evacuation is deemed necessary where persons on site are within the main dwelling during flood events.

Reoccupation

- 6.18. There may well be environmental hazards, loss of utilities, structural damage and other such issues, which may have to be rectified before people are allowed back to premises. When emergency services are in attendance to the property, they are to advise when it is safe to re-enter.
- 6.19. Care should be taken when entering a property after a flood event. Pollution, sewage, obstacles, raised manhole covers and sharp objects may be present within the property / local area.

Cleaning and repairing following a flood event

- 6.20. Take advice from specialists before starting repairs to your property. Most of the repair work after flooding will need to be undertaken by professionals appointed by your insurers.
- 6.21. Flood water may contain harmful substances like sewage, chemicals and animal waste which could make you unwell. If you come into contact with flood water, wash your hands thoroughly.
- 6.22. When cleaning after a flood always wear gloves, a face mask and sturdy footwear.



- 6.23. Before you start cleaning, take photographs to document damage and record the flood water height. Ask your insurer before discarding items that cannot be cleaned, like mattresses and carpets.
- 6.24. If your electricity supply is not already switched off at the mains, get a qualified person to do this. DO NOT touch sources of electricity when standing in flood water.
- 6.25. You can get water out of your property using a pump and generator. Position the generator outside in the open air as generators produce carbon monoxide fumes which can kill. Only pump out water when flood levels outside your property start to be lower than inside. This reduces the risk of structural damage.
- 6.26. If you use heaters or dehumidifiers to dry out your property, make sure there's good ventilation. Never use petrol or diesel-powered generators indoors – their exhaust gases are potentially lethal.



7. CONCLUSIONS

7.1. The development proposals, in which this Flood Risk Assessment is written for comprises a new oak framed garage on the footprint of existing sheds located at The Old Smithy, Holloway, Malmesbury, Wiltshire. The key conclusions are:

- The Old Smithy site is partially located in Flood Zone 2 & 3. The area of the proposed garage is mapped as being located in Flood Zone 2 and 3. The main dwelling is located in Flood Zone 1.
- Product 6 Flood modelling data has been reviewed and applied to the site specific levels. The proposed garage is located in Flood Zone 2. Areas to the south of the garage are located in flood zone 3 which abuts the existing footprint of outbuildings but does not reach the FFL of the development area.
- The application is for minor development which is applicable in the setting of the site as planning is supported by this site specific flood risk assessment
- A flood action plan is provided, minimal requirements are required due to the non habitual status of the proposed development
- Flood resilient and resistant measures are stated for implementation to the extension and can be reviewed / implemented to the existing dwelling where deemed appropriate.
- The proposed extension is sequentially located and the implementation of appropriate flood measures would deem that the proposed works are applicable in the setting of the site.
- The site is appropriately located for the flood zones, flood risk classification and use of the site.

7.2. The overall conclusions drawn from this report is that the development would be appropriately safe for its lifetime taking account of the flood risk vulnerability of the site and its users.



APPENDICIES

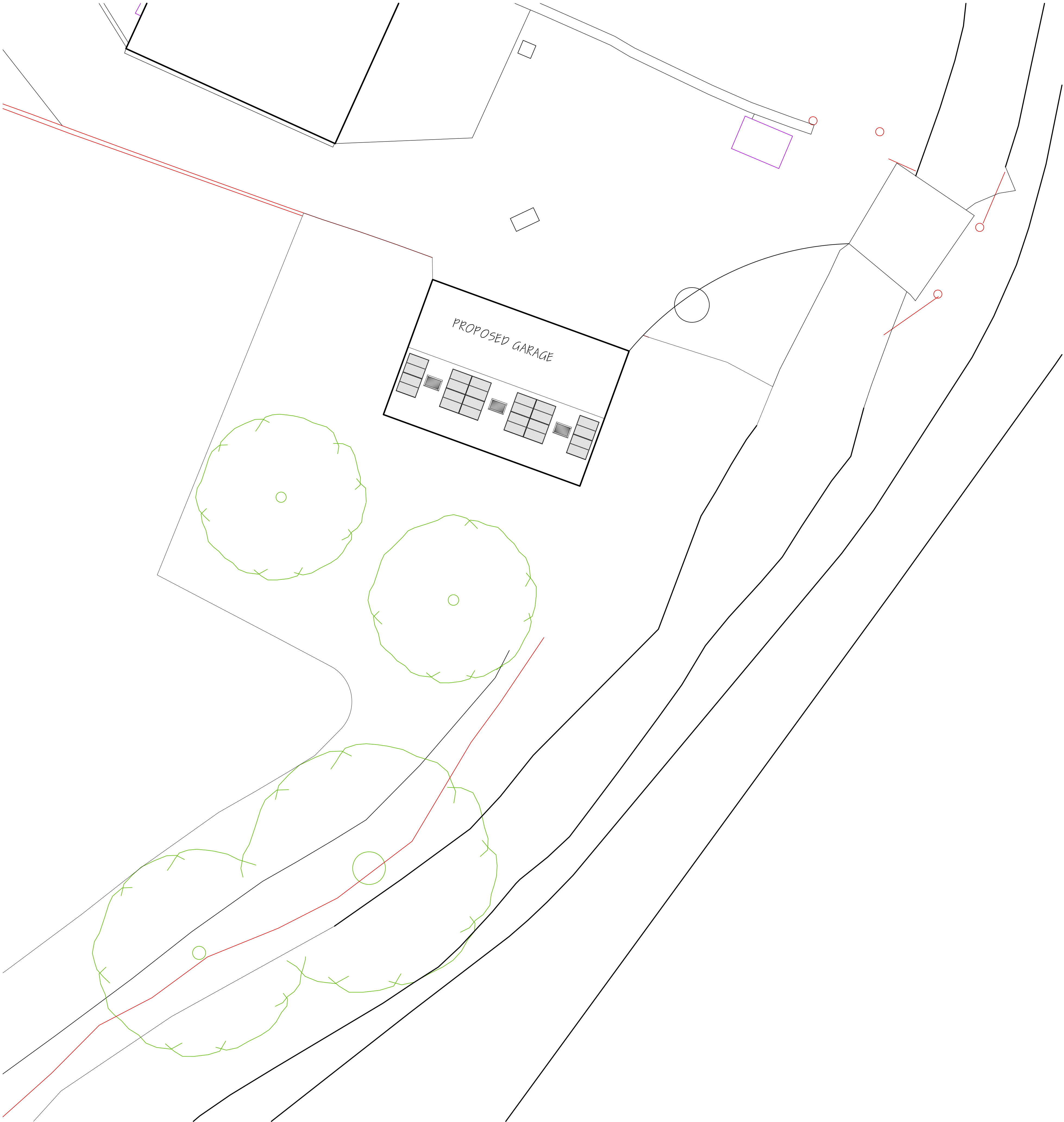
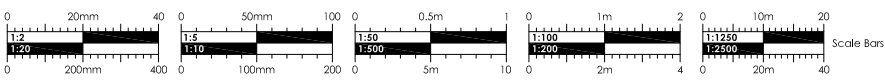


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APPENDIX A



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A	AMENDED FOR PLANNING	EM	17/04/26



PLANNING DRAWING



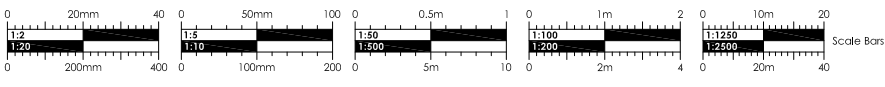
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Planning Architecture Conservation

Client MR & MRS P WEBB			
Project PROPOSED GARAGE, THE OLD SMITHY, HOLLOWAY, MALMESBURY, WILTSHIRE, SN16 9HX			
Description PROPOSED SITE PLAN			
Scale 1:100	PG Size A1	Drawn -	Date MAR '26
Drawing No 5920/50		Revision A	

APPENDIX B

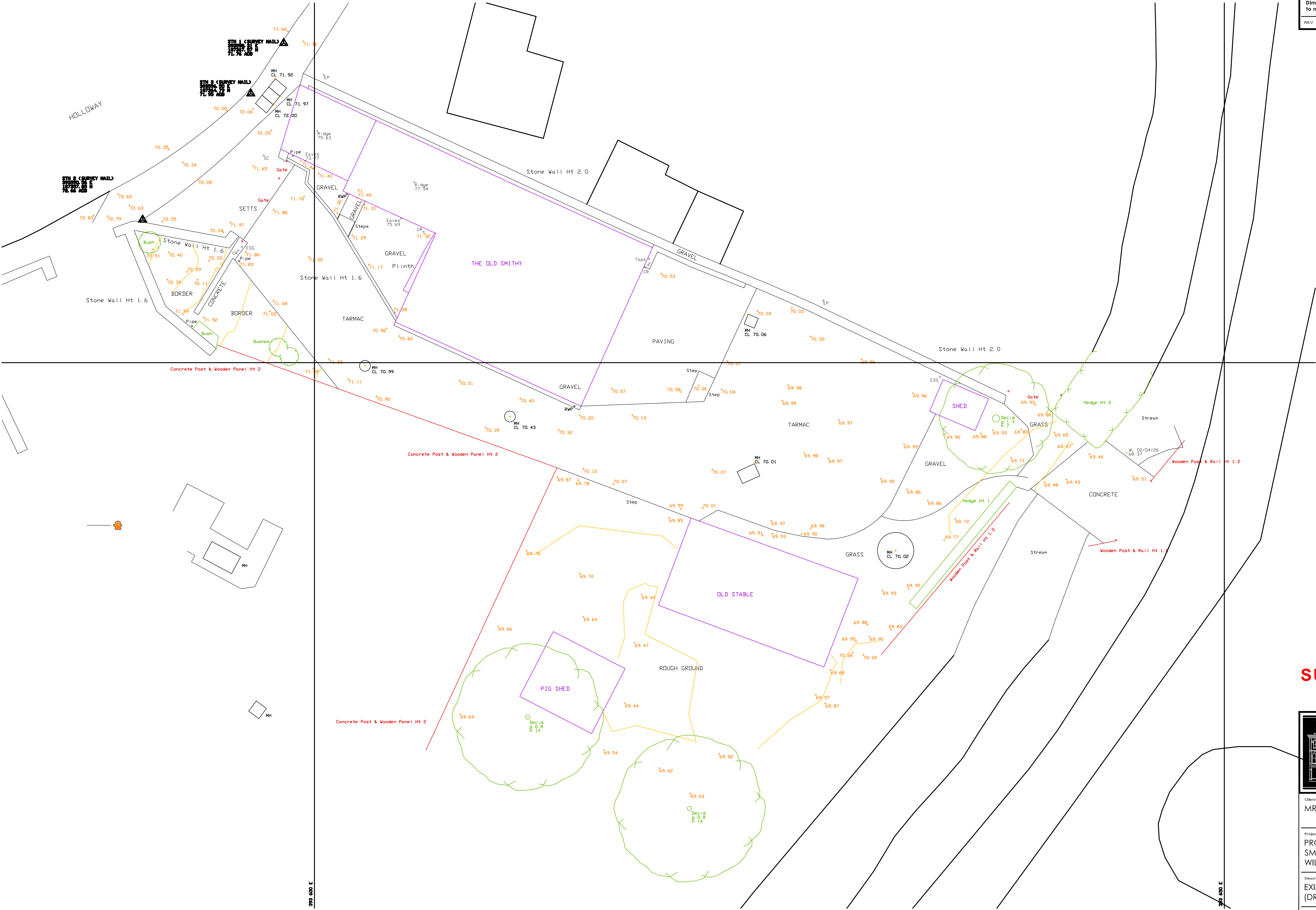


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REV	DETAIL OF REVISION	BY	DATE
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SURVEY DRAWING

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Planning Architecture Conservation

Client MR & MRS P WEBB			
Project PROPOSED NEW GARAGE, THE OLD SMITHY, HOLLOWAY, MALMESBURY, WILTSHIRE, SN16 9HX			
Description EXISTING TOPOGRAPHICAL SURVEY (DRAWN BY SITECH SURVEYING SERVICES)			
Scale 1:100	PG Size A1	Drawn -	Date JUN '26
Drawing No. 5920/05		Revision -	