

Technical note

Project	Land Adjoining Oak Hill House, Upper Seargry	Date	September 2025
Note	Planning Comments	Ref	
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Phoenix Design conducted a review of the FRA and Drainage Strategy produced by Sustain Environmental. The principal matters are:

Flood Risk

- 1.1 EA Risk of Flooding from Surface Water (RoFSW) mapping for the 1 in 100 year + climate-change event shows Medium risk (1 to 3.3% AEP) and Low risk (0.1 to 1% AEP) extents across the site access.



- 1.2 RoFSW shows surface-water ponding in the east of the site spreading toward a neighbouring garden, with further ponding on/adjacent to Startley Road from the unnamed watercourse. No sequential/exception test has been provided for the access.
- 1.3 PPG states that “where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the

lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied

- 1.4 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.”
- 1.5 This is further supported by paragraph 175 which states, “The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).”
- 1.6 Neither a sequential test or exception has been provided however these are required as:
 - a) The access route would be at risk of flooding, now and in the future
 - b) It cannot be ensured that occupiers and users would remain safe from current and future surface water flood risk

Surface Water Drainage Strategy

- 1.7 Flow Control Chambers rely on Ø25–26 mm orifices which are very small for surface-water controls and are prone to blockage/silting/icing. Many adopters/LLFAs typically look for ≥ 75 mm (some prefer ≥ 100 mm)
- 1.8 Model Cv values are 0.75 (Summer) and 0.84 (Winter). Wiltshire requires a CV value of 1 as set out in the Drainage and Betterment Strategy (June 2024) by Wiltshire Council. Wiltshire also required a 30% betterment on greenfield runoff rates