

## Upper Seagry – Commercial

### FRA Addendum 2 (November 2025)

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#### 1. Scope of Note

A Flood Risk Assessment (FRA) including a drainage strategy was provided in July 2025 with the planning application for the proposed development of land at Seagry House located off Henn Lane and Startley Road, Upper Seagry, Chippenham, SN15 5HD. The planning application number is PL/2025/06615.

Wiltshire Council (WC) as the Local Planning Authority (LPA) and Lead Local Flood Authority (LLFA) and third parties provided comments on the FRA. An FRA Addendum was provided in October 2025 to address these comments.

A Sequential Test was not considered by the applicant to be required for the planning application (and was not requested by the LPA at Pre-Application or Application stage).

Following further third party comments and requests for a Sequential Test, this note (by way of FRA Addendum 2) confirms the applicant's position and demonstrates that a Sequential Test is not required for the proposed development.

#### 2. Policy Test

In terms of the Sequential Test, the key NPPF policy is as follows:

National Planning Policy Framework (NPPF) Paragraph 175

*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).*

In accordance with Paragraph 175, the Sequential Test is not required in schemes where no built development within the site, including access or escape routes, is located in an area at risk of flooding.

The two buildings comprised in the proposed development have been located outside of the areas at risk of flooding. The main access and egress route to the site is via an existing junction with Startley Road to the east. A small section of this road and the junction are potentially affected by surface water flooding.

National planning policy advises a proportionate approach in applying paragraph 175 as follows:

Planning Practice Guidance (PPG) Paragraph: 027 Reference ID: 7-027-20220825 17 09 2025

*In applying Paragraph 175 a proportionate approach should be taken. Where a site-specific FRA 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 EA flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.*

As such (and as confirmed by the Opinion of Jack Smyth submitted by a third party), the Sequential Test need not be applied where:

- (a) 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; and
- (b) this is achieved without increasing flood risk elsewhere.

This note addresses both of these elements below.

### 3. The Safety of Occupiers and Users

As identified above, the only area at potential risk of surface water flooding is a small section of the main access to the site and existing junction with Startley Road to the east. The layout of the scheme (whereby buildings are located in areas not at risk of flooding) ensures that no other safety issues arise that need to be considered.

Furthermore, and as set out in the FRA, the finished floor level of new buildings should typically be set to at least the greatest of:

- 600mm above the design 1 in 100-year fluvial flood level, with the appropriate allowance for climate change depending on the expected life of the development;
- 300mm above the design water level in any local foul, combined or surface water drainage system; or
- 150mm above local ground levels to minimise flood risk.

In terms of the access, the usual depth of flood considered to be passable by vehicles is 0.30m, such as with the many fords that are found flowing across roads in the UK. As noted in the October 2025 FRA Addendum, the main access road is served by highway drainage. As such, the likelihood of the flood depth being greater than 0.30m is considered to be very low and no safety issue is considered likely to arise.

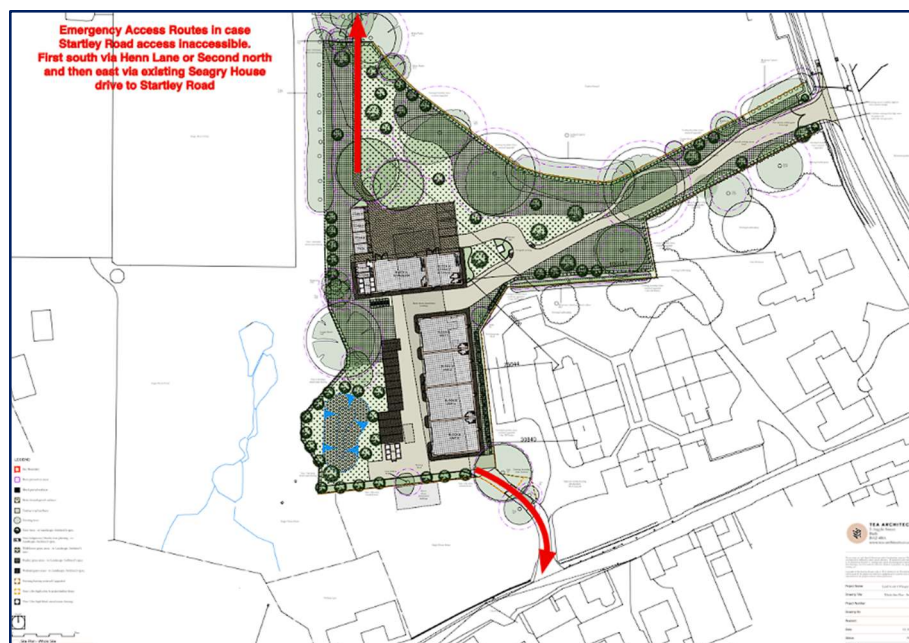


Figure 1 – Access and Egress Routes

It should also be noted that the proposed development is a commercial development, with the access and egress being used only by employees based at and visitors to the site. This land use is classed as “less vulnerable” in Annex 3 of the NPPF relating to the flood risk vulnerability classification, as shown in **Appendix A**.

In any event, the site has two alternative access and egress routes which are unaffected by flood risk. The first route connects the proposed development to Henn Lane which is intended as an emergency access. The second route passes along the existing track to the north along the front of Seagry House. These routes are illustrated in **Figure 1** included above.

If the main access and / or junction to Startley Road is affected by surface water flooding, one of the alternative access and egress routes will be available for use.

The applicant is willing to agree to the securing of a Site Access Plan through a pre-occupation planning condition to ensure that an appropriate alternative access is available in circumstances where the main access cannot be used.

#### **4. The Increase of Flood Risk Elsewhere**

The FRA assessed flood risk sources to and from the site, and concluded that the proposed development does not increase flood risk. A surface water drainage strategy would be incorporated to manage the surface water runoff from the proposed development.

The surface water drainage strategy would improve the existing position, even though this is not a policy requirement. In the current situation, surface water runoff drains from the site in an uncontrolled manner and therefore has the potential to exacerbate the existing surface water flooding.

The surface water drainage strategy would manage the rainfall from a 1 in 100-year rainfall event and include a 45% allowance for future climate change. Drainage from the site is therefore controlled and with the benefit of an additional storage provision being included for the management of more extreme rainfall events in the future.

#### **5. Summary**

The purpose of the Sequential Test is to ensure that development is located in appropriate areas in terms of their risk from and risk to flooding. As established above:

(a) The proposed layout and design of the proposed development ensures that it remains safe from current and future surface water flood risk for the lifetime of the development. Whilst there is some risk of surface water flooding to the Startley Road access, this is unlikely to give rise to a safety issue given the highway drainage in place and, in any event, alternative access and egress routes are available.

(b) The above position on safety will be achieved without increasing flood risk elsewhere. And as noted, the incorporation of a surface water drainage strategy would control the surface water runoff currently leaving the site to manage and result in betterment both now and in the future.

It is clear from the application of Government policy that a Sequential Test does not need to be applied in this case.

## **Appendix A**

### **Flood Risk Vulnerability Classification**

# National Planning Policy Framework

From: **Ministry of Housing, Communities and Local Government**  
 (/government/organisations/ministry-of-housing-communities-local-government)

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## Annex 3: Flood risk vulnerability classification

Information on flood risk vulnerability classification.

### Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- Solar farms.

### Highly vulnerable

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)

### More vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill\* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

### 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.

### Water-compatible development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

\*Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#)  
 (<https://www.legislation.gov.uk/uksi/2010/675/schedule/10>).