

16<sup>th</sup> March 2026

F.A.O. –  
Lead Local Flood Authority  
Wiltshire Council  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN



[Emailed to: paul.oshea@hsland.co.uk]

**TURNPIKE CLOSE, SEMINGTON**  
**Planning Reference: PL/2025/09736**  
**CONSULTATION RESPONSE**

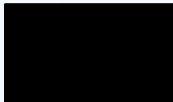
To whom it may concern,

We have been requested to provide a formal response to Wiltshire Council in relation to the comments issued by the Lead Local Flood Authority, in February 2026, concerning planning application reference: PL/2025/09736. We have discussed the comments with the client and have agreed an approach for addressing the concerns raised. It should also be noted that submitted Flood Risk Assessment and Drainage Management Strategy have also been updated as a result of the amendments required across various comments.

We have compiled a table (presented overleaf) that provides our response to each comment. The revised supporting documents have been updated, and the final column notes where the relevant changes can be found throughout these for ease in review.

I trust you will find the above of assistance, however, if you have any queries or require any further information, please do not hesitate to contact myself or the team.

Yours sincerely,



**Samuel Murray** BSc(Hons) MSc GradCIWEM  
Graduate Flood Risk Analyst  
**BETTS HYDRO LIMITED**



| COMMENT NO.       | LLFA COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | BETTS RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | ACTION                                                                                                                                                                                                                                                                                               |
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| <b>FLOOD RISK</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                      |
| 1                 | 1. In paragraph 1.1.6 of the submitted FRA the applicant indicates that further assessment of overland flow routes through the development will be required in order to demonstrate the development will not increase flood risk elsewhere. This has not been provided currently.                                                                                                                                                                                                                                                                       | <p>This section relates to planning policy context and outlines when the need to undertake the sequential test is likely to be triggered.</p> <p>This section has been updated to indicate, for this development the catchment originates onsite and as such, appropriate mitigation implemented during development would reduce flood risk both on and off site.</p> <p>As paragraph 1.1.6 was not relevant to these proposals, this has been removed.</p> <p>The updated PPG (2025), highlights there is no need to undertake the sequential test where a site-specific FRA demonstrates that appropriate layout, design and mitigation measures ensure occupiers and users remain safe from current and future surface water flood risk, without increasing flood risk elsewhere.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | HYD1097_TURNPIKE.CLOSE_FRA_2.0_CON: Section 1.0 updated to clarify that any overland flows are generated within the site itself and as such, appropriate mitigation will reduce the flood risk to and from the site. There is no need to undertake the sequential test in line with the updated PPG. |
| 2                 | The applicant's FRA indicates that significant portions of the site are at risk of pluvial flooding. The LLFA would encourage the LPA to consider on this basis, whether a sequential test to demonstrate how other sites at lower risk of flooding are reasonably available for development in line with NPPF. As this is a planning matter only, we will not speculate on whether the site passes the Sequential Test. The applicant themselves have identified the need for a Sequential Test to be completed in paragraph 6.1 of the submitted FRA. | <p>Paragraph 6.1 stated that 'an intra-site sequential approach should be taken' to locate development in the areas considered at least risk of flooding. An intra-site approach has been taken meaning development has largely avoided these areas shown to be at higher chance of surface water flooding. Although some development is in areas shown to be at a higher chance of flooding, these extents are not an indication of risk and are due to ponding of surface water generated on-site in low lying areas of the topography. Post development, this area will no longer be low lying where ponding can occur and the incorporation of a sustainable drainage strategy would safely capture, convey and attenuate any surface water flows which generate on-site. This paragraph has since been removed; however, the same statement is made in paragraph 4.8.1.</p> <p>In terms of pluvial flood risk, the FRA identifies (Paragraphs 4.4.15 – 4.4.18) that given the surrounding topography and presence of formal drainage systems, the site is largely at 'low' risk of pluvial flooding. Parts of the site to the west may be susceptible to some overland flows from the adjacent un-developed land, however the inclusion of an interception feature would mitigate against this. This can be implemented at the detailed design stage as part of a reserved matters application.</p> <p>The updated PPG (2025), highlights there is no need to undertake the sequential test where a site-specific FRA demonstrates that appropriate layout, design and mitigation measures ensure occupiers and users remain safe from current and future surface water flood risk, without increasing flood risk elsewhere.</p> | No action required.                                                                                                                                                                                                                                                                                  |

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| 3                                      | The applicant states that the LLFA have confirmed through correspondence in Appendix D that there are no records of historic flooding; this is incorrect the correspondence in Appendix D states that the LLFA cannot provide such information outside of the formal pre-application process.                                                                                                                                                                                                                                                                                                                                                        | Although the reports stated 'consultation has identified no historical flooding', this wording has been adjusted to say initial consultation <b>has not</b> identified any historical flooding.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | HYD1097_TURNPIKE.CLOSE_FRA_2.0_CON: Paragraph 4.7.2<br>Updated to say Initial consultation with the Environment Agency (EA), Wessex Water (WW), Wiltshire Council (WC) has been carried out for this application and <b>has not identified</b> historical flooding on or near to the site.            |
| <b>Surface Water Drainage Strategy</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                       |
| 4                                      | The applicant assumes that 55% of the area of the site will become impermeable because of the proposed development (a total area of 1.138ha) but is calculating run-off based on a 1.75ha area. As permeable areas are often discounted from the hydraulic models (due to them not having formal drainage) we require the applicant to either use a rate of 1.138ha for the calculation of discharge rate or demonstrate that the permeable areas of the site are included within hydraulic modelling. Given that the applicant is currently proposing to discharge of surface water via infiltration, this is likely to not be a significant issue. | The required stormwater storage provision for the site is to be confirmed following Soakaway testing to BRE365 and confirmation of infiltration rates. The proposed drainage system and storage provision will be appropriately sized to cater for any areas of positive connectivity into the drainage system.<br>Given that the stormwater storage provision cannot be calculated without the informing infiltration rates, attained through future Soakaway testing, to be carried out at the detailed design stage, as part of the Reserved Matters application it is believed that this can be conditioned at this outline stage.<br><br>Nonetheless, to satisfy the comment, the DMS report has been updated (section 4.7) to indicate that the discharge rate is not to exceed 3.8l/s where a formal connection to the surface water sewer is required. | HYD1097_TURNPIKE.CLOSE_DMS_2.0_CON: Section 4.7<br>Updated to identify that in the unlikely event a formal connection to the surface water sewer is required, the discharge rate is not to exceed 3.8l/s based on a rate of 3.3l/s/ha pro-rated for the post-development impermeable area of 1.138ha. |
| 5                                      | We note that the impermeable areas are an estimate at this stage and therefore these will need to be refined as part of the development of the detailed site proposals.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Impermeable area will be refined within detailed design at the reserved matters stage and as such, it is thought this can be conditioned at this outline stage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | No action required                                                                                                                                                                                                                                                                                    |
| 6                                      | The applicant currently has not undertaken soakaway testing in accordance with BRE365, and therefore the indicative size of infiltration basin cannot be relied upon. As this may result in significant changes to the overall development layout, and potential financial viability for the developer, these tests should be completed and used to iterate the current drainage management strategy.                                                                                                                                                                                                                                                | Whilst the infiltration basin size is indicative, the proposals are to incorporate a combination of local and regional scale infiltration methods to drain the site, such as bio-infiltration, permeable surfacing, raingardens and domestic soakaways following detailed design. Using this approach, it is likely that the size of the infiltration basin will be smaller than is currently shown. Additionally, it is believed that there is sufficient open space within the layout shown to cater for possible increase in infiltration basin size.                                                                                                                                                                                                                                                                                                       | No action required.                                                                                                                                                                                                                                                                                   |

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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Although Soakaway Testing has not been carried out at this stage, the intention is to undertake these tests at the detailed design stage as part of a reserved matters application and as such, we believe this can be conditioned at this outline stage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 7 | On paragraph 4.7.1 it is stated that there is an existing highway drain within Turnpike Close which could be a viable alternative; this statement is false. It cannot be assumed that the council will accept the additional discharge into the highways drain. In order to confirm this as a viable solution, the council would require full CCTV survey of the highways drain from point of connection to outfall and supporting hydraulic modelling of the network in order to demonstrate that there would be no detriment. Without this information it cannot be assumed that an outfall to the highways drainage system is viable. | <p>Section 4.7 now highlights the presence of both a highways drain and private surface water sewer within Turnpike Close. Should for whatever reason, infiltration be found un-feasible as a surface water management strategy, the proposals are to form a connection to the private surface water sewer and not the highways drain. However, this potential connection is a fallback solution, and current evidence suggests infiltration is a suitable means of surface water management for the site and as such, no connection is likely to be required.</p> <p>The updates have also captured an existing covenant for the site, which allows for a connection into the drainage systems within turnpike close. As this covenant is a confidential document, an extract has been included as Appendix J and the client has indicated this can be sent directly to the LLFA, in confidence, should it be required.</p>                                                    | <p>HYD1097_TURNPIKE.CLOSE_DMS_2.0_CON: Section 4.7</p> <p>Updated to highlight the presence of a private surface water sewer system within Turnpike Close for a which a formal connection is proposed in the unlikely event infiltration is found to be unsuitable.</p> <p>This section now also includes reference to an existing covenant allowing for the formation of such a connection.</p> <p>Appendix J added to include an extract of the existing Conveyance.</p> |
| 8 | In Appendix K the applicant states that "The information reviewed is not exhaustive and has been accepted in good faith as providing representative and true data pertaining to site conditions" – this statement implies to the LLFA that the applicant is not certain of their strategy or fully understand the site conditions. We would therefore have to object to the application at this stage.                                                                                                                                                                                                                                   | <p>Appendix K is included as a standard professional disclaimer relating to the use of third-party information and limitations associated with the report. It is not intended to imply any uncertainty regarding the site conditions or the proposed drainage strategy, merely that it is based on the information that as made available at the time of publication. Please note this is not contained within Appendix L</p> <p>All information included within the Flood Risk Assessment and Drainage Management Strategy are, to the best of our knowledge, factual, accurate, and derived from appropriate and reliable sources. The assessment reflects a proportionate and informed understanding of the site at planning stage. The disclaimer relates solely to professional liability in the event that provided third-party information is later found to be inaccurate or incomplete and does not affect the robustness or conclusions of the proposed strategy.</p> | No action required.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |