

Objection to the Flood Risk Management Report (FRMR) – PL/2025/06176, Manor Farm, Allington

Dear Ms Carney,

I wish to raise a formal objection to the Flood Risk Management Report (FRMR) dated 24th September 2025 & Catchment Impact Report dated 8th April 2024 submitted in support of the retrospective planning application for the “Wildlife” pond at Manor Farm, Allington.

This objection is based on the following grounds:

1. Incorrect Report Type and Missing Analysis

- A **Flood Risk Management Report (FRMR)** was submitted instead of a **Flood Risk Assessment (FRA)**, as required under the National Planning Policy Framework (NPPF) for developments within or adjacent to watercourses.
- Consequently, the submission lacks key components normally expected in an FRA, including:
 - Detailed hydraulic modelling,
 - Pre- and post-development flow comparisons,
 - Consideration of climate change allowances, and
 - Assessment of both upstream and downstream impacts.

2. Author Qualifications

- The report was **not prepared by an appropriately qualified professional** with accreditation from the Chartered Institution of Water and Environmental Management (CIWEM) or equivalent engineering body.
- Flood risk reports should be signed off by a **Chartered Engineer or Hydrologist**, to ensure technical robustness and accountability.

3. Alterations to the River Gog and Misleading Statements

- The FRMR incorrectly states that “*the profile and route of the watercourse have not been altered.*”
 - In reality, the installation of a **sluice/dam structure** and the **removal of approximately 35 metres of the Gog’s bank** have materially changed the channel’s cross-section, route, and flow behaviour.
 - The **Environment Agency** has previously confirmed that any **impoundment of water will alter water levels and flow characteristics**, meaning this statement in the FRMR is demonstrably false.
-

4. Inaccuracies in the Catchment Impact Report

- The report asserts that the River Gog lies *entirely within Manor Farm ownership* and that *no third-party land is affected*.
 - This is incorrect. Figure 2 in the Catchment Impact Report **omits to identify our property**, shading it instead as land owned by the applicant.
 - We are situated only **50 metres upstream**, and we have observed:
 - A **noticeable rise in water levels**,
 - **Increased sediment accumulation**,
 - **Erosion of the stream banks**, and
 - **Reduced flow velocities**.
 - Prior to the installation of the pond and sluice, the Gog regularly dried out in summer months — this no longer occurs, indicating a fundamental alteration in its hydrological regime and biodiversity.
 - Other neighbouring properties also border the Gog, and **their potential impacts have not been assessed**, contrary to EA guidance.
-

5. Incomplete Flood History

- The FRMR refers only to the **January 2024 flood event**, incorrectly dated as the 6th (the actual date was 4th January).
 - It omits subsequent flooding on **28th March 2024**, which affected our home directly.
 - Omitting later events undermines the report's credibility and fails to represent the current flood risk baseline.
-

6. Misrepresentation of Sediment and Flow Pathways

- The Catchment Impact Report acknowledges that:

“The impact on the local area is most noticeable upstream, where the river flows under the road through a sedimented culvert and excess water was diverted through the farmyard and river to the west of the culvert and through Mr Oram's garden.”

I agree that sedimentation has worsened — **impounding water exacerbates this issue**. However:

- The claim that water passes through the farmyard is incorrect; the farmyard sits at a higher elevation.
 - In practice, **excess water flows onto the lane, through our property, and back into the Gog**, with some continuing further downstream before re-entering the channel.
 - This diversion and modification of the natural flow path **should not have been implemented without a full Flood Risk Assessment**, and the altered bank and diversion should be either justified or reinstated.
-

7. Unsupported Ecological Claims

- The FRMR claims that the pond “*enhances ecological value by increasing hydro-morphological diversity and creating habitats for amphibians and invertebrates.*”
 - However, it also admits that the watercourse “*currently lacks notable ecological features*”—despite the pond having been in place for five years.
 - The report provides **no ecological survey data or baseline comparison** to substantiate the claim of biodiversity improvement.
-

8. Pond Design and Non-Compliance with DEFRA Guidance

- The pond does not appear to have been designed or managed in accordance with **DEFRA’s best practice for creating wildlife ponds** (see: <https://defrafarming.blog.gov.uk/create-ponds-and-lakes/>).
- DEFRA guidance specifically advises against creating ponds for:
 - Retaining flood water,
 - Intercepting drainage or polluted runoff,
 - Fish stocking or gamebird rearing, or
 - Situations where the pond is connected to a natural watercourse.
- It also recommends avoiding ponds:
 - Near roads, yards, or arable runoff sources,
 - Within existing habitats or riverbanks, and
 - Without shallow, undulating sides for safe wildlife access.

These principles appear to have been disregarded in the pond’s design and operation.

Summary

The FRMR is incomplete, factually inaccurate, and professionally inadequate. It fails to properly assess **upstream impacts, alters natural hydrology, and omits key flood events** affecting neighbouring properties. The omission of qualified authorship and absence of a full Flood Risk Assessment mean the report should not be relied upon for planning or flood risk decision-making.

I therefore request that Wiltshire Council require submission of a **revised, independently verified Flood Risk Assessment**, undertaken by a **qualified Chartered Hydrologist or Engineer**, that fully assesses both upstream and downstream effects and provides mitigation where necessary.

Sioned Allen Bsc(hons)



The pale blue line is the route the Gog would usually take UNDER the lane. The dark blue line is the water rapidly escaping the Gog due to the drainage channel & removed section of the Gog's bank. Please Note the 'DRY' section of the lane under which the culvert passes.

Water exiting the Gog via the drainage channel due to being unable to pass under the culvert. 4th January 2024.



Flooding inside our house 4th January 2024.



28th March. Water flowing off the lane in Allington and into the driveway along our house prior to re entering the Gog below the culvert.



Inside our home on 28th March:

