

Jemma Foster
Wiltshire Council
Development Control
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our ref: WX/2025/139536/01-L01
Your ref: PL/2025/09486

Date: 23 January 2026

Dear Jemma

**RESERVED MATTERS - FOR SCALE, LAYOUT, ACCESS, APPEARANCE, LANDSCAPING
FOLLOWING OUTLINE PLANNING CONSENT 20/00379/OUT**

LAND SOUTH OF TROWBRIDGE, SOUTHWICK, TROWBRIDGE

Thank you for consulting the Environment Agency on the above application.

We have reviewed the following documents;

- Flood risk assessment by Teignconsult, ref. 447/FRA2, Version 4, dated 04/11/2029 (20/00379/OUT)
- Drainage Technical Note submitted 02/12/2025 reference 447/FRA2 V4 – 4.11.2019

Environment Agency Position

We **object** to the application as submitted because the applicant has not supplied adequate information which assess the scheme's flood risk implications.

Reason(s)

The Reserved Matters submission fails to include the requested drawing detailing the proposed bridge design and associated floodplain compensation works. This omission is significant and prevents a proper assessment of the scheme's flood risk implications.

Culvert and bridge design

The Flood Risk Assessment (FRA) submitted in support of the outline application (Teignconsult, ref. 447/FRA2, Version 4, dated 04/11/2029) states that *"the bridge soffit shall be set 600 mm above the design flood level, inclusive of a 39% allowance for climate change"*. However, in the absence of the relevant drawings and supporting calculations, it is not possible to assess compliance with this requirement or to establish the impacts of the bridge on flood flows and floodplain storage.

The proposed bridge must be designed and constructed so that it does not result in any reduction in floodplain storage capacity during any flood event, including events both below and exceeding the design flood level.

Drawing FRA5 submitted as part of the Flood Risk Assessment (FRA) for the outline application (20/00379/OUT) indicates culvert lengths of 12.5m, 20m and 11m. However, the subsequently submitted Drainage Technical Note (Ref: CLFA142 CLFA 00 XX DR 0661) and associated drawing CLFA142 CLFA 00 XX DR C 0500 show that the culvert lengths have been reduced to 10m, 20m and 10m respectively.

It is unclear whether these revised culvert dimensions have been incorporated into the flood

modelling. Clarification is therefore required to confirm that the updated culvert sizes have been assessed and that the reduction in size will not result in an increased risk of flooding on site or to third party land.

Floodplain Compensation

The outline Flood Risk Assessment (FRA) states that the proposed development would result in a loss of 493m³ of floodplain storage, with a proposed compensation volume of 552m³, equating to a 12% betterment. However, the Technical Drainage Note References Drawing No. CLFA142-CLFA-00-XX-DR-C-0500, which indicates that a floodplain compensation volume of 557m³ is proposed.

The discrepancy between these figures has not been explained, and it is unclear whether the stated compensation volumes account for the revised culvert dimensions. Furthermore, it has not been demonstrated that the claimed 12% betterment remains valid in light of these changes.

Without clarity and justification on this point, there is insufficient confidence that the proposed floodplain compensation is appropriate, accurately calculated, or effective.

Furthermore, the application does not provide sufficient evidence to demonstrate that adequate floodplain compensation will be delivered. In order to assess the acceptability of the proposed development, we require detailed information demonstrating that:

- A volume of compensatory floodplain storage equal to or greater than the volume lost as a result of the proposed development will be provided;
- This compensatory volume is achieved across all levels between the lowest point of the site and the design flood level, rather than solely at a single level;
- The assessment is undertaken using a recognised methodology, typically involving a comparison of lost and compensatory volumes through a series of horizontal slices across the relevant vertical range, with each slice generally no greater than 0.2 metres in thickness.

Modelling

The Environment Agency has recently undertaken updated flood modelling for the surrounding area. This is not currently reflected in the flood map for planning. It is recommended that this data is requested and reviewed in order to confirm that the flood zone extents align with those presented in the submitted modelling. This can be requested through Wessex Enquiries- WessexEnquiries@environment-agency.gov.uk

Overcoming our Objection

To overcome our objection, the applicant should submit the requested drawings and documents which address the above to enable full review and assessment.

If this information cannot be provided, it is likely that our objection will be maintained. Please re-consult us on any revised documents submitted.

Note to LPA

If you are minded to approve the application contrary to our objection, we request you contact us prior to a decision being made to allow us to make further representations.

If you have any queries regarding our response, please get in touch

Yours sincerely

Ms Lindsay Fello
Sustainable Places - Planning Advisor

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End