



Environment
Agency

Samantha Stockley
Wiltshire Council
Development Control
Monkton Park Offices
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref: WX/2026/139660/01-L01
Your ref: PL/2025/09893

Date: 25 February 2026

Dear Samantha

POLE BARN FIELD SHELTER AND BUILDING UP OF GROUND LEVEL.

WEST MILL FARM, WEST MILL LANE, CRICKLADE, SWINDON, SN6 6NB

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

We have reviewed the following documents:

- Flood Risk Assessment (ref KCC3159, dated January 2026)
- Block Plan (ref KCC3159/03A, dated January 2026)
- Elevations and floor plan (ref KCC3159/04, dated January 2026)

The application site lies within Flood Zone 3b defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Policy Guidance (PPG) as having a high probability of flooding.

Environment Agency Position

We **object** to this application on the following grounds.

Objection 1 - Flood Zone Incompatibility

We **object in principle** to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

Reason

The NPPF [Annex 3: Flood risk vulnerability classification](#) classifies development types according to their vulnerability to flood risk. PPG [Table 2: Flood risk vulnerability and flood zone 'incompatibility'](#) provides guidance on which developments are incompatible with certain Flood Zones.

Wiltshire Council's Level 1 Strategic Flood Risk Assessment (SFRA), published 2024, states that Flood Zone 3b, the functional floodplain, is defined as the 3.3% Annual Exceedance Probability (AEP) flood extent. Where this is not modelled, the 1% AEP should be used. According to the best available model data in this location, the site

boundary (from the submitted block plan) is shown to fall within the 1% AEP flood extent. Therefore, we consider that the site lies within Flood Zone 3b.

The development is classed as 'less vulnerable' in accordance with Annex 3 of the NPPF. Table 2 of PPG makes it clear that this type of development, is not compatible with this Flood Zone and therefore should not be permitted.

Overcoming Objection 1

To overcome our objection the applicant must provide suitable evidence that the development is not within Flood Zone 3b. Based on the current information submitted, this has not been adequately demonstrated. If this cannot be achieved, we are likely to maintain our in-principle objection.

Please note that before addressing our objection 2 below our policy objection above will need to be overcome.

Objection 2 - Inadequate Flood Risk Assessment

In the absence of an adequate flood risk assessment (FRA), we **object** to this application and recommend that planning permission is refused.

Reason

The submitted FRA (ref KCC3159, dated January 2026) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- use the most up to date available information to assess flood risk
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- take the impacts of climate change into account
 - There is no assessment of the impact of climate change using appropriate climate change allowances. In accordance with [government guidance on climate change allowances](#), the central 2080s allowance of 26% should be considered within the FRA. As submitted, the development proposes inadequate:
 - Flood storage compensation
 - Resistance and resilience measures
 - Safe access and escape routes

Flood risk information

Detailed flood risk modelling is available at this site and must be used to inform an FRA. The impacts to and from the development over a range of flood events should be assessed, including the 1% annual exceedance probability (AEP) plus an appropriate allowance for climate change flood event.

Please visit the [Flood Map for Planning service](#) to obtain the relevant flooding information for this site. This information is provided in the form of flood map products. The product supplied depends on the type and size of the development being undertaken.

Alternatively, the applicant may wish to contact our Customers and Engagement team at enquiries_THM@environment-agency.gov.uk. When requesting this information, please provide them with the full site address, site plan, and explain that you require the information for a FRA for a development. Please note that it may take up to 20 working days for your request to be fulfilled.

Climate change

Refer to '[Flood risk assessments: climate change allowances](#)' to determine which allowances should be used to assess future flood risk for your development and location. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood level lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

Floodplain storage and compensation

The site lies within Flood Zone 3b defined by the Planning Practice Guidance to the National Planning Policy Framework (NPPF) as having a high probability of flooding. The proposed development will result in a loss of floodplain storage and will impede flood flow within the 1% annual exceedance probability (AEP) flood extent with an appropriate allowance for climate change. The proposed development will therefore increase the risk of flooding both onsite and elsewhere, which is contrary to paragraph 181 of the National Planning Policy Framework.

We note from sections 1.3 and 1.9 of the submitted FRA that the land has been raised by approximately 350mm to situate the proposed pole barn "above any likely flood levels". The FRA fails to demonstrate that any loss of floodplain storage within the 1% annual exceedance probability (AEP) plus an appropriate allowance for climate change flood extent caused by this can be mitigated. Consequently, there will be a loss of floodplain storage. Given the site's location, it is possible that flood flow routes have also been affected by this land raising, which further increases the risk of flooding elsewhere via the diversion of these flows.

Any increase in built footprint or raising of ground levels must be compensated up to the 1% AEP plus an appropriate allowance for climate change flood level (the design flood level). This is necessary to prevent the proposed development reducing floodplain storage and displacing flood waters, thereby increasing flood risk elsewhere.

Level for level floodplain compensation is the preferred method of mitigation and should be considered within the FRA. Level for level floodplain compensation is the matching of floodplain storage volumes lost with new floodplain storage volume gained through the reduction of ground levels. Please note for this to be achievable it requires land on the edge of the floodplain and above the 1% annual exceedance probability (AEP) flood level with an appropriate allowance for climate change to be available. A comparison of ground levels (from a topographical survey) with modelled floodplain levels will show if

land is available above the 1% AEP flood level with an appropriate allowance for climate change to be used as compensation.

We recommend that level for level floodplain storage calculations are provided in a table that sets out the volume of floodplain storage lost (cut) and the volume of floodplain storage gained (fill) for each of the slices. Typically, the thickness of a slice should be 100mm or 200mm, dependent on-site specific considerations. This may vary in the case of large, very flat sites, where 0.05 metres could be used; or in very steep sites with a high range of flood water levels. Slice thickness should be set to provide 10 to 15 slices in these cases. It will need to be demonstrated that there would be no net loss in storage volume for any slice.

A location plan that corresponds with the table should also be submitted showing where the compensation will be located on site. The location of the changes in floodplain storage should be clearly identified, demonstrating the scheme would be hydraulically connected for each slice. It is not acceptable to propose works several kilometres away or separated from the site by a significant structure such as a weir, bridge or other obstruction.

Excavation of the proposed floodplain compensation scheme should be completed prior to the construction of development to ensure floodplain capacity is maintained.

If this cannot be achieved, then the applicant may need to amend the development to ensure that there will be no increase in flood risk elsewhere (for example by reducing built footprint or amount of land raising proposed).

Overcoming Objection 2

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted.

Specifically, the FRA will need to:

- calculate an appropriate allowance for climate change using those advised in ['Flood risk assessments: climate change allowances'](#)
- demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere

Advice to LPA/Applicant - Flood warning and emergency response

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

This is not considered within the submitted FRA. Whilst the nature of the development will mean it is not permanently occupied, there remains a risk to life due to flooding which has not been assessed or mitigated.

This does not mean we consider that the access is safe, or the proposal is acceptable in this regard. **We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuations.**

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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Phone 020 3025 1229