

Wiltshire Council

Reference: PA-0004194/01

Customer reference: PL/2026/00267

02 June 2026

Proposed domestic vehicular access & gates and parking space

2-4 SOUTH STREET MARLBOROUGH WILTSHIRE SN8 2DW

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

Environment Agency position

In the absence of an adequate flood risk assessment (FRA) we **object** to this application.

Reasons

The submitted FRA (ref MWA 25074, March 2026 by Mathewson Waters Architects LLP) 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:

- consider how a range of flooding events (including extreme events) will affect people and property
- take the impacts of climate change into account
 - There is no assessment of the impact of climate change using appropriate climate change allowances. Without an assessment of the impacts of climate change on flood risk, the risk to people and property in this location over the lifetime of the development is not known.
 - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels 1% + 21% CC. Consequently the development proposes inadequate flood storage 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. From the submitted FRA it is unclear whether 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 could therefore increase the risk of flooding both onsite and elsewhere which is contrary to paragraph 181 of the National Planning Policy Framework.

Overcoming our objection

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.

Advice to Applicant

The FRA will need to include a topographic survey to provide existing and proposed ground levels to explain whether there will be any land raising within FZ3b. Furthermore, the FRA would need to 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

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.

Flood risk information

It is necessary to determine the likely level of flooding at this site to calculate the volume of compensatory flood storage that might be required and assess the proposed new bridge.

Conservative flood levels for the 3.3% annual exceedance probability (AEP) and the design flood level could be agreed using information available on the Flood Map for

Planning alongside a site-specific topographical survey. Based on these agreed levels, the floodplain compensation scheme and bridge should then be designed accordingly.

Floodplain storage

Any raising of ground levels should be compensated up to the 1% AEP plus an appropriate allowance for climate change flood level. 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. We recommend that level for level floodplain storage calculations are provided in a table that sets out the change in volumes across the site using 100mm or 200mm slices (dependent on site specific considerations), stating the losses and gains for each slice. It will need to be demonstrated that there would be no net loss in storage volume for any slice. The location of the changes in floodplain storage should also be clearly identified in a plan or drawing that demonstrates the scheme would be hydraulically connected for each slice.

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

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,

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