



TECHNICAL NOTE	
Job No.	22-0400
Project Name	Land South of The Forty, Cricklade
Technical Note Title	Flood Risk and Sequential Test Commentary
Client	Hannick Homes
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DOCUMENT AUTHORISATION	
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1. Flood Risk and Sequential Test Commentary

A Flood Risk Assessment (FRA) was submitted in support of the application. The FRA confirmed that the site is at low risk from fluvial flooding and lies within Flood Zone 1. The Environment Agency's flood zones reflect present-day, undefended flood risk from rivers and the sea, and on that basis the site is wholly within the lowest-risk zone. Since submission of the application, the Flood Map for Planning has been updated to show the "Flood Zones plus climate change" layer; this shows the extent of that layer encroaching into the site.

It should be noted that this climate change extent is not a flood zone; the site's flood zone designation remains Flood Zone 1. In policy terms the site would be regarded as potentially affected by future fluvial risk rather than as falling within a higher flood zone. The national flood risk standing advice does, however, list the "Flood Zones plus climate change" extent among the circumstances in which a Sequential Test would be required; this is addressed below.

The published "Flood Zones plus climate change" layer forms part of the National Flood Risk Assessment (NaFRA2), a national-scale product that applies a nationally consistent modelling approach and generalised climate change allowances; it is a strategic starting point and is not intended to determine flood risk at an individual site. Detailed modelled flood data for this watercourse has been obtained from the Environment Agency through a Product 6 data request. The Product 6 data represents the detailed, site-specific output of the Environment Agency's own hydraulic model and, where it differs from the generalised national mapping, provides the more accurate representation of fluvial flood risk.

The figure below shows the worst-case scenario within that model, the 1 in 1,000 year event (0.1% AEP) with a climate change allowance of 72%. It confirms that the site lies well outside all modelled fluvial flood extents, including those incorporating the relevant climate change allowances, and therefore outside areas of fluvial flood risk both now and over the lifetime of the development.

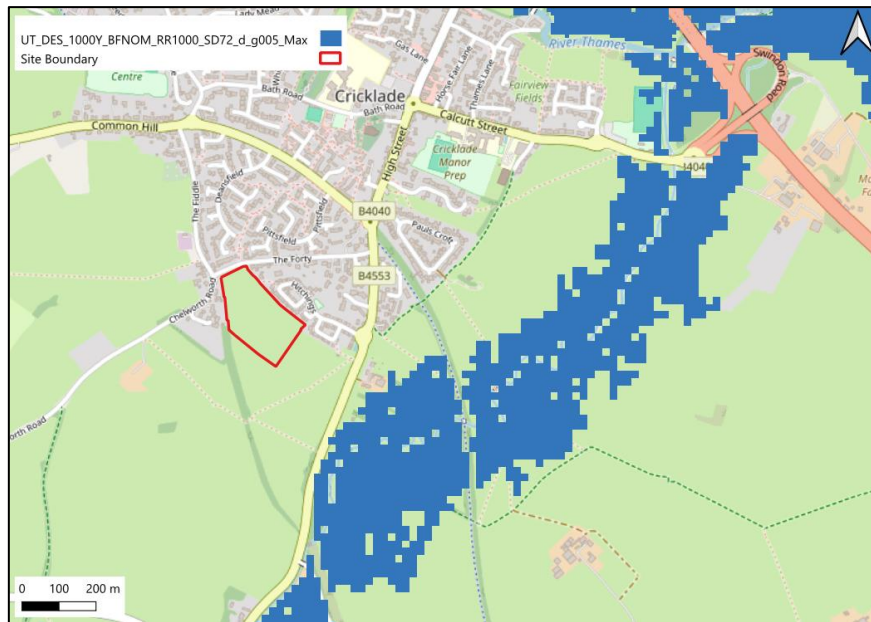


Fig 1 – Fluvial Flood Extent from EA Model for 0.1% AEP + 72% Climate Change

The Environment Agency's national surface water flood mapping identifies the majority of the site as falling within a high-risk zone for surface water (pluvial) flooding. Given the identified surface water risk, detailed modelling has been carried out and mitigation measures are proposed to ensure that the development can be brought forward safely while posing no increase in risk to third-party land. The submitted documents provide further detail and confirm that the surface water risk can be managed within the site so that occupiers and users would remain safe for the lifetime of the development, taking climate change into account, and without increasing flood risk on third-party land. This work has been approved by the Lead Local Flood Authority (LLFA).

With respect to the Sequential Test, in relation to fluvial flooding, the site lies within present-day Flood Zone 1. The sequential, risk-based approach to individual applications set out in paragraphs 173 to 175 of the National Planning Policy Framework provides, at paragraph 175, that the Sequential Test need not be applied where a site-specific flood risk assessment demonstrates that the development would be located outside areas at risk of flooding from the source in question, both now and in the future. The detailed Product 6 modelling confirms that the site sits outside all modelled fluvial events, including those incorporating the relevant climate change allowances. The development is therefore located outside areas at risk of fluvial flooding both now and over its lifetime, and the circumstance that would otherwise engage the Sequential Test in respect of fluvial risk does not apply.

In relation to surface water flooding, Paragraph 027 of the Planning Practice Guidance on Flood Risk and Coastal Change (as updated in September 2025) provides that, where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere, the Sequential Test need not be applied. The FRA demonstrates that these requirements are met, and the Sequential Test is therefore not required in respect of surface water flood risk.

Accordingly, taking fluvial and surface water flood risk together, no Sequential Test should be required in support of the application.

In compliance with the requirements of the National Planning Policy Framework, and subject to the mitigation measures proposed, the development will neither cause nor be subject to significant flood risk.