

Joe Richardson
Wiltshire Council

Reference: WX-2026-139638/02
Customer reference: PL/2026/00347

11 August 2026

Dear Joe,

Reserved Matters (Appearance, Landscaping, Layout and Scale) for 140 Dwellings, a Habitat Support Area and Associated Landscaping and Works (Outline Permission PL/2022/02452)

Stones Farm, West Mill Lane, Cricklade, Swindon, Wiltshire, SN6 6JL

Thank you for reconsulting us on the above application.

Environment Agency position

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

Reason(s)

The submitted flood risk information 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 submitted flood risk information does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the submitted flood risk information fails to:

- consider whether flood risk will be increased in the surrounding area
- take the impacts of climate change into account
 - 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 for the Gloucestershire and the Vale Management Catchment 2080s central allowance of 26%. Consequently, the development proposes inadequate
 - Flood storage compensation

Overcoming our objection

To overcome our objection, the applicant should submit revised flood risk information, or a Flood Risk Assessment (FRA) which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us when new flood risk information or a FRA is submitted.

Specifically the FRA will 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
- demonstrate that the proposed fencing will not impede flood flows

Floodplain storage

We welcome that the applicant has proposed all dwellings outside of Flood Zone 2 and 3. From the 'HSA Landscape' document we understand that two ponds will form a wetland area to the north of the site. The proposed ponds will be full all year round and landscaping works are proposed, including topsoil to be stripped and used to form compacted bunds. The location and size of these bunds are unclear. It is also unclear whether the proposed works will reduce floodplain storage, this needs to be assessed within the application.

The applicant may need to use modelling to assess floodplain storage calculations. In this location we hold a local flood model, the Thames (MRL to St Johns) 2014 model. Please contact our Customers and Engagement Team to obtain 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. Please contact them to request flood level and modelled extent information for the site. Your request can be sent by email to enquiries_THM@environment-agency.gov.uk.

Any increase in built footprint or 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.

Boundary treatments

From the 'HSA Landscape' document we understand that "temporary fencing will be in place for two years" around the new ponds and wetlands. It is unclear from the information provided the design of the fencing and whether it is permeable to floodwater.

Walls and fences can have a significant impact on the flow and storage of flood water, especially if they are constructed across a flood flow route. This can lead to higher levels of flood water on the upstream side of the fence or wall which will potentially increase the flood risk to nearby areas. Therefore walls and fences should be permeable to flood water.

Note to LPA

We are reliant on the accuracy and completeness of the reports in undertaking our review and can take no responsibility for incorrect data or interpretation made by the authors.

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,

Lindsay Grant
Planning Advisor (Wessex - Sustainable Places)

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