

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.

Condition 14 of PL/2022/02452 (as below) stipulates the detailed drainage scheme is to be based on the information that formed the approved Outline application (sustainable drainage principles SuDS) and the submitted Flood Risk and Drainage Strategy (ref 824-ER-01)). We therefore are not required to provide a further Flood Risk Assessment as part of our application.

Condition 14 information will be submitted once the Reserved Matters has been approved, as is typical, and we will evidence the full suite of items required as part of this condition.

We have, however, provided further commentary to clarify the particulars sought (more on this below each comment received).

As noted in the condition, our design has to ***'demonstrate that there will be no increased risk of flooding or loss of floodplain as a result of the pond creation and associated works in flood zones 2 and 3.'*** In addition to a number of additional items which address concerns raised.

Condition 14 - No development shall commence on site until a detailed drainage scheme (based on sustainable drainage principles SuDS) and the submitted Flood Risk and Drainage Strategy (ref 824-ER-01) has been submitted to and approved in writing by the local planning authority. The design will:

- i. Restrict surface water discharge rates from the site during a 1 in 1 year rainfall event to no more than 80% of the greenfield run off rate;
- ii. show a pipe/link and manhole/node numbers that correlate to the calculations;
- iii. be informed by a sensitivity analysis on the drainage network considering surcharged outfall conditions;
- iv. show exceedance routes for flows in excess of the 1 in 100 years plus climate change event;
- v. demonstrate that the finished floor levels are above the maximum predicted 100 year flood levels or, if no flooding is predicted, at least 150mm above (or a height to be agreed with the local planning authority) the surface water drainage cover levels;
- vi. demonstrate that there will be no increased risk of flooding or loss of floodplain as a result of the pond

creation and associated works in flood zones 2 and 3.
The drainage scheme shall be implemented before the first occupation and/or use of the development and be constructed in accordance with the approved details.

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

The Flood Risk Assessment and Drainage Strategy (FRADS) dated 7th January 2021, submitted as part of the outline planning application identified all risks of flooding to the site and the surrounding area within chapter 2. Site Specific Flood Risk is further explored within chapter 3 with risk levels from all sources of flooding tabulated in Table 3.1 (extract taken below).

Flood Source	Potential Risk				Description
	High	Medium	Low	None	
Fluvial (River or Sea)			X		The site is generally in Flood Zone 1
		X			Part of the HSA is in Flood Zone 2.
	X				The Northernmost Part of the HSA is in Flood Zone 3.
Canals			X		There is a disused Canal to the East of the Development, however EA Mapping confirms this does not present a Flood Risk.
Groundwater			X		Envirocheck report suggests low ground water risk.
Reservoirs and Waterbodies				X	The site is shown to fall outside of the area at risk of reservoir failure.
Sewers			X		Due to the limited surface water sewer network in proximity to the site and the topography of the site it is unlikely to present a flood risk.
Pluvial Runoff (Surface Water)		X			Flood Mapping shows the site to be at low risk of surface water flooding. Surface water flooding is shown in the Northern HSA near the Thames.
Effect of Development on Wider Catchment			X		Development is unlikely to result in any impedence or loss of flood plain
		X			The development will increase the area of impermeable surfaces leading to a potential increase in runoff.

Table 3.1: Potential Pre-Mitigation Sources of Flood Risk

Chapter 4 of the FRADS provided flood risk mitigation measures that would be employed by the Drainage Strategy and includes reference to the Sequential Test and how the developed site, being within flood zone 1 mitigates against the need for a Sequential Test (as per extract below).

Sequential Arrangements

- 4.2.2. Since the development site lies wholly in Flood Zone 1, a sequential site arrangement is not necessary.

It should be further noted that the recently submitted Drainage Strategy addresses concerns of the LLFA regarding discharge rate which has been reduced from Qbar to the 1-year rate.

- 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

The extract below is from the government website for considering climate change allowances for rainfall events within the Gloucestershire and the Vale Management Catchments (as is currently displayed on their website).

3.3% annual exceedance rainfall event

Epoch		
	Central allowance	Upper end allowance
2050s	20%	35%
2070s	25%	35%

1% annual exceedance rainfall event

Epoch		
	Central allowance	Upper end allowance
2050s	20%	40%
2070s	25%	40%

*Use '2050s' for development with a lifetime up to 2060 and use the 2070s epoch for development with a lifetime between 2061 and 2125.

As seen the central band is 25% and the upper band is 40%. As the Drainage Strategy recently provided for this development is attenuating the 1 in 100-year plus 40% climate change

allowance, by default the central band (25% climate change allowance) is already attenuated. Calculations proving the design are provided in appendix G of the recently submitted Drainage Strategy.

- Flood storage compensation

The attenuation pond is solely within flood zone 1 and therefore does not require consideration within flood plain calculations. The two wetland ponds to the north of the site are within Flood Zone 2 and therefore do not need to be considered within the flood plain 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

As mentioned above, both the attenuation pond and the wetland ponds (to the north) are outside of a flood plain. As such, their areas do not need to be considered within flood plain compensation calculations. Further to this the attenuation pond is within flood zone 1 and does not impact upon a flood zone. The wetland pond design is such that the levels are reduced. Bunding wording should not have been present, the wording has therefore been removed. The excavated material will be removed from the location and taken to be used within soft landscaped areas within the flood zone 1 parts of the site.

- demonstrate that the proposed fencing will not impede flood flows

Drawings 247-107-1/2 Flood Routing Plans are available which show the proposed flood water routing in times of blockage or exceedance above the 100-yr (plus climate change) event. The fencing does not impede flows of the site.

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.

Please see above response.

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The location and size of these bunds are unclear. It is also unclear whether the proposed works will reduce floodplain storage, and this needs to be assessed within the application.

Please see above response.

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

The wetland ponds are located north of the built development adjacent to the River Thames. They are located within flood zone 2 and therefore do not require consideration within flood plain compensation.

The originally submitted FRADS along with the recently submitted Drainage Strategy meet the requirements of Paragraphs 20 and 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk checklist.

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.

Temporary fencing notes should not have been present, the note to this effect has been removed.

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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