

Samantha Stockley
Wiltshire Council

Reference: PA-0009305/01
Customer reference: PL/2026/04464

26 August 2026

Dear Samantha

Outline planning application for the change of use of land for the siting of up to 38 holiday lodges, including creation of new vehicular access off Spine Road West, extension of existing shared footway and cycleway along the B4696 Spine Road East and associated landscape planting and infrastructure with all matters reserved except the means of access to the site

LAKE 62, COTSWOLD WATER PARK, DERRYFIELDS, ASHTON KEYNES

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

Environment Agency Position

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

- **Objection 1 - Flood Zone Incompatibility**
- **Objection 2 - Inadequate Flood Risk Assessment**

OBJECTION 1 - Flood Zone Incompatibility

We **object** 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.

Reasons

The site is currently used as a recreational lake so the development proposal will result in an increase in vulnerability from 'water compatible' to 'more vulnerable' as set out in Annex F: Table 2 of the NPPF. Based on the Planning Statement it mentions that the proposed lodges will be located on the lake shore, with a section of the lodge being over the lake, as illustrated in the Proposed Site Plan.

The Planning Practice Guidance (PPG) sets out that the functional floodplain (Flood Zone 3b) should be identified and defined by the LPA in their Strategic Flood Risk

Assessment (SFRA). Core Policy 67 of Wiltshire Core Strategy [Adopted January 2015] refers to the SFRA (Wiltshire's Level 1 SFRA [November 2024]) which sets out the definition of functional floodplain.

The SFRA mentions where 3.3%AEP is not available the 1%AEP should be used as a proxy for defining functional floodplain. The Thames (MRL to St Johns) 2014 does not have a 3.3%AEP modelled scenario but does have a 1%AEP. The model shows that most of the site lies within the 1%AEP modelled scenario therefore within be considered precautionary Flood Zone 3b.

Annex F: Table 3 'Flood risk vulnerability and flood zone 'incompatibility' provides guidance on which developments are incompatible with certain Flood Zones. As the development is classed as 'More Vulnerable' in line with the NPPF, Annex F Table 3 makes it clear that this type of development is not suitable in Flood Zone 3b and is therefore against policy.

Overcoming objection 1

The applicant can overcome our objection by clearly demonstrating that the proposed development site is located outside of Flood Zone 3b (1 in 30 (3.3%AEP)).

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 acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason

The submitted FRA 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 the flood risks posed by the development. In particular, the FRA and associated documents fails to:

- To reduce the risk of flooding to the proposed development and future users
- demonstrate the development will not increase flood risk elsewhere
- consider how people will be kept safe from the identified flood hazards

Modelling

The applicant's FRA has used the Thames (MRL to St Johns) 2014 model for assessing flood risk in particular the 1%AEP plus 70%CC. Our models are not designed to assess third party developments, so it should not be assumed that this model is suitable for their proposed development. There may also be new information available since the creation of the model that should be considered, such as hydrological and topographical information. It is for the applicant to check the

suitability of an existing model and make any necessary updates. More information on modelling can be found at [Using modelling for flood risk assessments - GOV.UK](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments).

Finished Floor Levels (FFLs)

The applicant's FRA highlights that the site is a high risk of fluvial flooding. It states in section 7.2 of the FRA that ***“EA data confirms this risk giving a maximum flood level of 88.34 mAOD associated with the 100yr return event + 70%CC and with the lowest lake bank elevation of 87.54 mAOD, this results in a maximum flood depth beyond the lake banks of 0.80 m”***. The FRA mentions FFLs be set at a minimum of 88.94mAOD [Section 5.1] but this is only mentioned as a recommendation. The FRA should clearly set out the proposed finished floor levels for the lodges. Finished floor levels should be set above the 1% AEP flood level with an appropriate allowance for climate change. We also require that finished floor levels are raised at least 600mm above this level.

In addition to FFLs, there is mention of property flood resilience measures in the FRA e.g. temporary flood barriers. However, it is not clear which measures are being proposed for this application and whether these measures will be applied to all of the proposed lodges.

Floodplain Compensation

The lodges are shown to be within the 1%AEP plus appropriate allowance for climate change extent. 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.

The FRA is proposing the use of stilts with a void beneath to allow water to pass underneath the buildings.

It should be noted PPG049 states ***‘Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials’***.

The FRA has not considered any other form of mitigation for the loss of floodplain storage and is solely reliant on buildings having a void to provide compensation for the loss of floodplain storage. It should be noted no plans e.g. elevation plans have been submitted with this application.

Safe Access and Escape

Safe access and escape have been mentioned under Section 4.16 in the FRA, where it proposes access via Ashton Road. The FRA highlights that some of the

route falls within the Flood Zones due to its proximity to Cerney Wick Brook. In Figure 3.1 of the Flood Evacuation Management Plan [April 2026], it illustrates the proposed route. These documents focus on the route offsite, but it should be noted that there is a risk of flooding within the red line boundary, and the hazard does vary across the site (excluding the lake) ranging from very low hazard to danger for most. This assessment of hazard should be included in the FRA and the **Council's Emergency Planners should be consulted** in relation to flood emergency response and evacuation arrangements for the site.

Overcoming Objection 2

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 on any revised FRA submitted.

Advice to LPA/Applicant - Flood Warning and Emergency Response

In Annex F of the NPPF, under more vulnerable development types, sites used for holiday or short-let caravans and camping are subject to a specific warning and evacuation plan. A Flood Evacuation Management Plan has been submitted with this application. 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 F7 of the NPPF and the guiding principles of the PPG.

As mentioned above safe access and escape has been mentioned in the FRA and Flood Evacuation Management Plan [April 2026]. These documents focus on the route offsite, but it should be noted that there is a risk of flooding within the red line boundary and that hazard varies across the site. The Thames (MRL to St Johns) 2014 has hazard information that can be obtained by the applicant.

Advice to Applicant– Modelling data

Information from our flood modelling should 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.

We note that the FRA states that Product 4 data was not available at the time of request however this should now be available. Please contact enquiries_THM@environment-agency.gov.uk for the Thames (MRL to St Johns) 2014 model. When requesting modelled flood levels and modelled flood extents please provide them with the full site address, site plan, and explain that you require the information for an FRA for a development.

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,

Lindsay Grant
Planning Advisor (Wessex - Sustainable Places)

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