

Verity Giles-Franklin
Wiltshire Council

Reference: PA-0009642/01
LPA reference: PL/2026/04502

04 September 2026

Full planning application for the demolition of existing dwelling ('Uplands') and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road.

UPLANDS WEST ASHTON ROAD TROWBRIDGE WILTSHIRE BA14 6DW

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 – Modelling review Required

Objection 2 – Inadequate Flood Risk Assessment

Objection 1 – Modelling review required

The submitted site-specific flood model indicates flood risk conditions that differ significantly from those shown on the Environment Agency's published Flood Map data. Before the model can be relied upon to inform the assessment of flood risk and any associated mitigation measures for the proposed development, the Environment Agency must undertake a technical review of the model, including its assumptions, inputs, methodology and outputs.

Overcoming Objection 1

The applicant should submit full flood modelling files for review.

The applicant's flood risk consultant is advised to thoroughly review the information at the following link [Using modelling for flood risk assessments - GOV.UK](#)

This will maximise the chances of the review being successful and prevent repeated communications with our national modelling review team.

If/when a suitable site specific flood model has been finalised, this should be used to inform a revised FRA.

Advice to Applicant

To enable the Environment Agency to progress the review, the applicant should contact the Environment Agency (on wx.sp@environment-agency.gov.uk) at the earliest opportunity to arrange the transfer of the full flood modelling files and supporting data. Upon completion of this review, the Environment Agency will provide further advice regarding the acceptability of the model and the implications for the proposed development.

When emailing us, please request a Quatrix link for uploading the data files, and copy in the LPA's case officer, so they're aware of progress.

Within our cover email to the LPA, we have included a 'Modelling Submission Checklist' for the applicant/ consultant to complete and submit alongside their model files.

Objection 2 – Inadequate Flood Risk Assessment

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 whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- Provide details of floodplain compensation as a result of the raised access road.
- Comply with the NPPF recommended 600mm freeboard for finished floor levels.

Overcoming Objection 2

Once the modelling review has been completed and the model has been found 'fit for purpose' the applicant should submit a revised FRA which addresses the points highlighted above and includes any updates required due to the model review.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted.

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)

National Contact Centre: 03708 506 506
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