

Joe Richardson
Wiltshire Council

Reference: WX-2026-139638/03
Customer reference: PL/2026/00347

10 September 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 the Environment Agency.

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:

- 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

Floodplain storage

We welcome that the applicant has proposed all dwellings outside of Flood Zone 2 and 3. We agree with the 'Environment Agency Response' document dated 20/08/2026 that the attenuation pond is in Flood Zone 1 and does not require floodplain compensation but we don't agree that further flood risk assessment is not required as part of this application as we have concerns with the creation of the 2 wetland ponds and landscaping to the north of the site, that fall in 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 and that 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 'Environment Agency Response' document dated 20/08/2026 states that "The 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". However, the new Landscape and Ecology Management Plan dated August 2026 states that bunds will be approximately 1.5m in height and tapering to a 3m base. Further clarification is required, if bunds are proposed within the design flood event, floodplain compensation will be required.

The latest Landscape and Ecology Management Plan has been revised to remove mention of any bunding. This was an oversight by the consultant which should have been removed in the previous revision submitted August 2026.

The '3 x Detailed HSA Landscape' document dated 08/08/2026 shows topographical levels in relation to the wetland. It is unclear whether these levels are existing or proposed. From the submitted document the central, low points of the point are higher than surrounding areas. For example, the low point of the north pond is 79.56mAOD and the outer part of the proposed pond is 79.48mAOD. Further information is required about the proposed pond design to understand whether any land raising is taking place. From the submitted plans, it is unclear whether the proposed works will reduce floodplain storage, this needs to be assessed within the application.

The '3 x Detailed HAS Landscape' document dated 08/08/2026 only show existing (topographical) levels there are no proposed levels shown. Instead, the descriptions indicate depths and slopes and the wording within all current documentation relates to digging below existing ground levels. It is now clear that there will be no loss of floodplain and no raising of levels.

The applicant may need to use modelling to assess floodplain storage calculations.

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.

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 an 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 stated in our responses above the current reports and drawings indicate that there will be no loss of floodplain resulting from the proposed ecological earthworks. All ponding will be created by reduced digging with no bunding. All excavated material from the proposed ponds in the flood zone areas will be removed and either relocated out of the flood zone or removed from site to a suitable licensed landfill site.

Advice to Applicant – Modelling

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.

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)

National Contact Centre: 03708 506 506

wx.sp@environment-agency.gov.uk

Rivers House, Sunrise Business Park, Higher Shaftesbury Road, Blandford Forum, Dorset
DT11 8ST