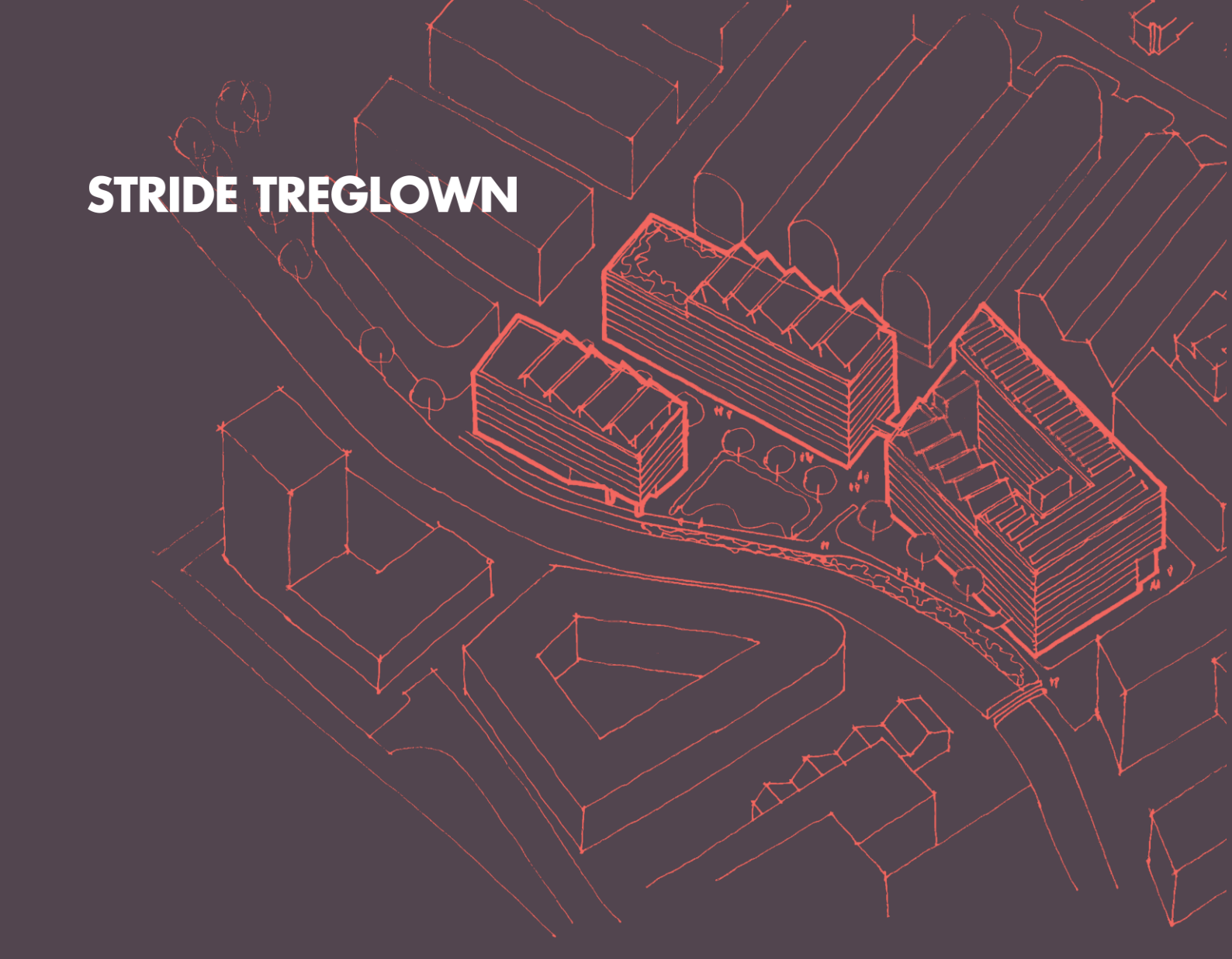




STRIDE TREGLOWN

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Planning Statement

CPUK Flood Resilience Scheme | July
2025

CLIENT

Cereal Partners UK

JOB TITLE

Flood Defence Scheme

LOCATION

Staverton, Trowbridge

POSTCODE

BA14 6PG

JOB NO.

157222

DATE

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REVISION NUMBER

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1. Introduction

- 1.1.1 This Planning statement has been prepared in support of a full planning application for the installation of a new flood resilience strategy at the existing Cereal Partners Worldwide (CPW) food manufacturing campus at Staverton, Trowbridge.
- 1.1.2 This application follows a significant flooding event in November 2024 where flood waters came close to breaching the factory office buildings, risking safe production and manufacturing.
- 1.1.3 Cereal Partners Worldwide Staverton manufactures approximately 22,000 tonnes of breakfast cereals annually for the UK market, including popular brands such as Shreddies and Shredded Wheat. To safeguard the site against potential future flooding and to facilitate further development and expansion, the implementation of a flood resilience scheme is proposed, which includes the design of a flood wall along the site's perimeter. The description of development is as follows;

Installation of Flood Resilience Measures approx. 490 metres in length to include; removal of existing concrete kerb and replacement with new (max 450mm in height), installation of sheet piles/dwarf wall (450mm in height and approx. 70m in length) and flood gates.

- 1.1.4 This Statement should be read in conjunction with the submitted drawings and documents which are listed as follows;
- Application Forms
 - Site Location Plan
 - Flood Risk Assessment prepared by Edenvale Young
 - Dwg no. EVY1164-003 – Flood Resilience – Sections
 - Dwg No. EVY1164-001 – Flood Resilience – General Arrangement – Sheet 1
 - Dwg No. EVY1164-001 – Flood Resilience – General Arrangement – Sheet 2
 - Staverton Modelling Report prepared by Edenvale Young
 - Flood Estimation Report prepared by Edenvale Young

2. Site Context

2.1. Site Description

- 2.1.1 The existing Cereal Partners Worldwide (Nestle) food manufacturing campus is situated on the eastern side of the B3105 road and on the northern outskirts of the village of Staverton, Trowbridge. The site comprises a variety of industrial and packaging facilities and is bisected by a channel known as the Weston Cut. The main industrial buildings and service yards are located to the south of the site.

2.2. Flood Risk

- 2.2.1 The wider Staverton site currently consists of Flood Zones 2 and 3 (Flood Zone 3 being the highest probability of flooding with an annual probability greater than 1%).

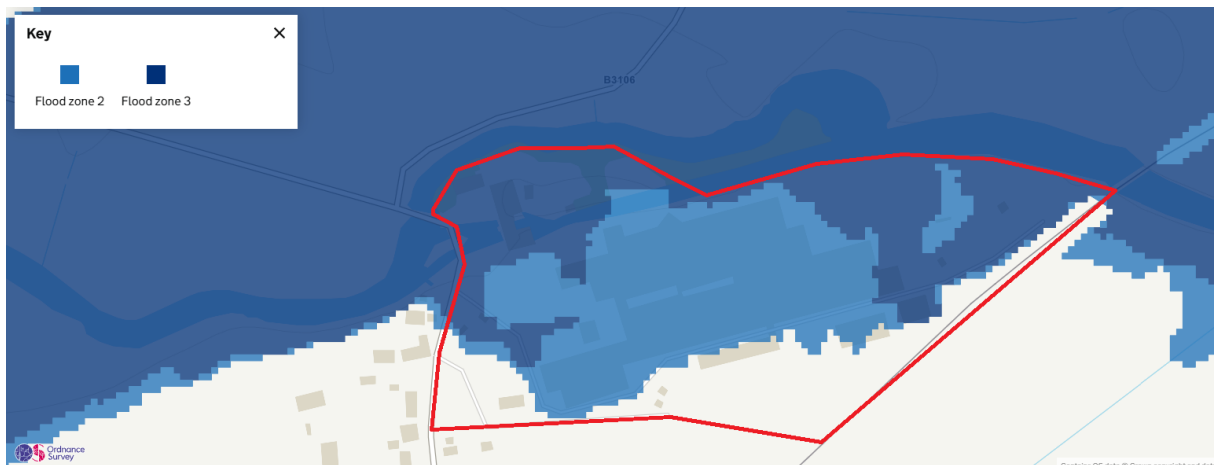


Figure 1: Image indicating current location of Flood Zones 2 and 3 with location of site outlined in red

2.3. Heritage

- 2.3.1 The site does not lie within a conservation Area. The nearest listed building is the Grade II Wesleyan Chapel located approximately 200 metres to the south west of the site.

2.4. Land Use/Environmental Designations

- 2.4.1 The site does not lie within a National Landscape Area (formerly Areas of Outstanding Natural Beauty), a National Park, a Site of Special Scientific Interest or any other EU designated site (Special Protection Areas or Special Areas of Conservation).

2.5. Planning History

- 2.5.1 The Staverton campus benefits from a wealth of positive planning history. Two of the most recent applications relates to the extension of existing buildings;
- Application Ref: 17/10332/FUL – Extension to existing wheat intake building – approved in December 2017
 - Application Ref: 17/02383/FUL – installation of replacement water tanks - approved in May 2017

- 2.5.2 The planning officer's report for 17/02383/FUL confirmed that the site is located within an established area of Staverton, identified as a small village under policy CP7 of the Wiltshire Core Strategy. Officers acknowledged that the proposals would be situated within the built up area of the Nestle Cereals factory and would support existing employment land, therefore acceptable in principle.

3. The Proposed Development

- 3.1.1 This application follows a significant flooding event in November 2024 where flood waters came close to breaching the factory office buildings, risking safe production and manufacturing
- 3.1.2 To safeguard the site against potential future flooding and to facilitate further development and expansion, the project team were appointed to undertake fluvial flood modelling for CPUK. The purpose of the flood modelling is to;
- Confirm the predicted flood risk to the site;
 - Support enhancements to the site’s resilience to flooding, including accounting for future climate change impacts, in recognition of the operational importance of the CPUK facility to Nestlé;
 - Demonstrate that the installation of improved vehicle containment kerbs—introduced to enhance vehicle and pedestrian safety—does not result in an increased flood risk elsewhere during the Design Flood Event.
- 3.1.3 The proposed strategy to improve flood resilience comprises several elements:
- Replacement of existing kerbs with higher, vehicle-containment kerbs;
 - Installation of sheet piling and a shallow flood defence across open land and around the electricity substation;
 - Flood gates at access points, forming a continuous line of defence alongside the Weston Cut.
- 3.1.4 These measures are designed both to improve site safety and enhance the flood resilience of the factory. It is important to note that the main service yard will not be protected and will be allowed to flood during extreme events.
- 3.1.5 The crest levels of the proposed defences are shown in Appendix A of the supporting Flood Risk Assessment prepared by Edenvale Young, and have been set at a minimum of 300mm above the modelled 1% Annual Exceedance Probability (AEP) flood level, including a 71% allowance for climate change. This corresponds to the Upper End climate change allowance for the 2080s epoch, representing a precautionary approach.
- 3.1.6 Some localised areas of the site are predicted to flood under the Upper End climate change scenario. However, these areas remain outside the extent of flooding for the Central climate change allowance and do not displace floodwater during the Design Flood Event (DFE). As such, they are considered permissible under current flood risk guidance.
- 3.1.7 The flood extents and water levels referenced above have been determined using bespoke hydraulic modelling, as described in Section 5 of the accompanying Flood Risk Assessment.
- 3.1.8 The proposed development does not impact upon safe pedestrian and vehicular access within the factory campus.

4. Planning Policy Context

- 4.1.1 This section identifies the key national and local planning policies of relevance to the site and proposed development.

4.2. National Planning Policy Framework (NPPF 2024)

- 4.2.1 At the heart of the NPPF is a presumption in favour of sustainable development. There are three overarching objectives (economic, social, and environmental) in achieving sustainable development, which are interdependent and need to be pursued in mutually supportive ways.

Section 4: Decision-making

- 4.2.2 Paragraph 39 states, “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.

Section 14: Meeting the challenge of climate change, flooding and coastal change

- 4.2.3 The NPPF seeks to direct new developments away from areas at highest risk of flooding. Where 50 development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 173 confirms that a sequential risk-based approach should be taken to individual applications in areas known to be at risk now or in future from any form of flooding.
- 4.2.4 Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (para 174)
- 4.2.5 Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
- 4.2.6 The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

4.1. The Local Development Plan

- 4.1.1 The current development plan for Wiltshire comprises of the Wiltshire Core Strategy adopted in 2015. This incorporates Saved policies from former District Local Plans, that were not replaced by the WCS, and will continue to be saved until replaced as part of the Local Plan Review process.
- 4.1.2 The following policies are relevant to the site and proposals;

Policy CP1 (Settlement Strategy)

- 4.1.3 Policy CP1 directs new development to the key settlements in Wiltshire, including Melksham where the site is located. Policy CP1 establishes in-principle support for the proposed development as it is located within the settlement boundary for Melksham where sustainable development is encouraged.

Policy CP2 (Delivery Strategy)

- 4.1.4 Policy CP2 further confirms support for new development within the settlement limits. In line with Core Policy 1, the delivery strategy seeks to deliver development in Wiltshire between 2006 and 2026 in the most sustainable manner by making provision for at least 178ha of new employment land.

Policy CP35 (Existing Employment Sites)

- 4.1.5 Policy CP35 confirms that Wiltshire's Principal Employment Areas (as listed in the Area Strategies) should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.

Policy CP67 (Flood Risk)

- 4.1.6 All new development must include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

4.2. Wiltshire Local Plan Review

- 4.2.1 The Government requires every Local Plan to be reviewed at least once every five years. Wiltshire's Local Plan, the Wiltshire Core Strategy, was adopted in 2015, and is therefore being reviewed. This review is termed the 'Local Plan review'.
- 4.2.2 Wiltshire Council are in the advanced stages of their review which was submitted to the Secretary of State for examination in November 2024. It is expected that the Local Plan Review will be adopted in early 2026 which will likely coincide with the determination of an application for the new building.
- 4.2.3 Relevant updated policies are summarised below;

Policy 2 (Delivery Strategy)

- 4.2.4 Emerging Policy 2 sets an updated requirement to deliver approximately 160 hectares of new employment land (Use Class B2, B8, E(g)(i-iii)).

Policy 4 (Addressing Climate Change)

- 4.2.5 Policy 4 confirms that development proposals must support a move to carbon neutrality and adaptation to climate change. As such, a Sustainable Energy Statement confirming how it meets the tests set out within Policy 4 must be submitted alongside any application for full planning permission.

Policy 95 (Flood Risk)

- 4.2.6 The council will follow a sequential approach to flood risk management, in line with national policy and guidance. All development proposals will be required to consider the effect of the proposed development on flood risk from all sources, both on and offsite, commensurate with the scale and impact of the development.

- 4.2.7 Policy 95 confirms that new developments must ensure that flood risk is addressed to flood depths for a 1 in 100-year storm event plus climate change in line with Environment Agency guidance. The drainage strategy must demonstrate that development proposals will remain safe during a flood event throughout its lifetime and consider access, egress and emergency exit routes.

5. Design and Access Statement

- 5.1.1 The proposed works include site preparation and the installation of a concrete flood defence barrier consisting of replacement of existing concrete kerb with up to 450mm concrete kerb and installation of new raised kerb.
- 5.1.2 The positioning of the flood defence barrier seeks to make use of existing hardstanding and concrete infrastructure where possible and has been sited over 10 metres away from the river bank to minimise ecological impacts. The proposed development will provide a vital piece of flood defence infrastructure where it is needed.

5.2. Design

- 5.2.1 The alignment of the proposed flood defence barrier extends to approximately 490 metres in length with a maximum height of 450mm.
- 5.2.2 The proposed strategy to improve flood resilience comprises several elements:
- Replacement of existing kerbs with higher, vehicle-containment kerbs;
 - Installation of sheet piling and a shallow flood defence across open land and around the electricity substation;
 - Flood gates at access points, forming a continuous line of defence alongside the Weston Cut.
- 5.2.3 The alignment of the proposed flood defence barrier extends to approximately 490 metres in length with a maximum height of 450mm.
- 5.2.4 These measures are designed both to improve site safety and enhance the flood resilience of the factory. It is important to note that the main service yard will not be protected and will be allowed to flood during extreme events.
- 5.2.5 More detail is presented in the following drawings and reports prepared by Edenvale Young;
- Flood Risk Assessment
 - EVY1164-003 – Flood Resilience – Sections
 - EVY1164-001 – Flood Resilience – General Arrangement – Sheet 1
 - EVY1164-001 – Flood Resilience – General Arrangement – Sheet 2

5.3. Access

- 5.3.1 Vehicular and pedestrian access is not affected by the proposed development.

6. Pre-app engagement with Environment Agency

- 6.1.1 The applicant team and their flood risk engineers, Edenvale Young, sought Pre-application advice from the Environment Agency in April 2025 with respect to the emerging hydraulic model. At the time of writing, feedback from the Environment Agency is expected by the end of August 2025.

7. Planning Considerations

- 7.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise. In this section, the planning issues raised by the proposed development are considered against the prevailing planning policy framework and the associated Development Plan. This section identifies any material considerations that should also be considered as part of the proposed development. In doing so, it demonstrates the planning rationale for the proposed development, and why planning permission should be granted.
- 7.1.2 Having established the site conditions, the prevailing planning policy framework and the likely effects arising from the proposed development, the main planning issues raised by this application are considered within the remainder of this section under the following headings:
- Principle of Development
 - Flood Risk
 - Amenity

7.2. Principle of Development

- 7.2.1 Tackling the effects of climate change, addressing flood risk and increasing flood resilience, as well as safeguarding open space and recreation have widespread support at national and local level.
- 7.2.2 The Wiltshire Core Strategy sets out that climate change remains a key issue for the Local Plan to address. This can be achieved through supporting schemes that seek to promote more sustainable forms of transport, sustainable construction methods, the delivery of low carbon and renewable energy, increases and enhancements to green infrastructure, and ensuring that development is adequately protected from flood risk.
- 7.2.3 The proposed development seeks planning permission for minor interventions to provide robust flood resilience measures and improve site safety and enhance the flood resilience of the factory. The proposed development is therefore entirely consistent with the objectives of local and national planning policy.

7.3. Flood Risk

- 7.3.1 A Flood Risk Assessment prepared by Edenvale Young is submitted in support of this application for full planning permission. The assessment outlines the flood risk implications associated with this area of the factory campus and how the proposed development will mitigate the risk.
- 7.3.2 The proposed measures are Water Compatible and have been located outside of the modelled 1% AEP plus 26% allowance for climate change. They will therefore result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.
- 7.3.3 The proposed flood resilience measures would remove the factory site from Flood Zone 3 by providing significant protection from future flood events, whilst still maintaining a functional flood plan for the River Avon when needed. The defences constitute water compatible development, which is deemed appropriate to be located within zones 3a and 3b.

- 7.3.4 With the above in mind, the proposed development is therefore fully compliant with national planning policy and policies 67 (Flood Risk) and 68 (Water Resources) of the adopted Wiltshire Core Strategy.

7.4. Amenity

- 7.4.1 The proposed flood resilience measures have been designed to minimise land take by re-using existing hard standing for the most part and by being positioned on the periphery of the factory campus. With a max height of 450mm above ground level, the interventions are minor in nature and would not have a detrimental impact upon visual amenity.
- 7.4.2 Construction works have the potential to result in some limited noise, dust and vibration impacts due to activities associated with plant use and construction vehicle movements. However, these impacts are likely to be localised and temporary in nature over the duration of the daytime only construction works. Hence, any associated air quality or amenity impacts are not considered significant. Nonetheless, should the Council consider it necessary, a suitably worded condition could be attached requiring the submission of a Construction Management Plan to ensure noise, dust and vibration are kept to a minimum.
- 7.4.3 Overall it is considered that the proposed development will accord with Policy 57 (High Quality Design) of the adopted Wiltshire Core Strategy.

8. Conclusions

- 8.1.1 The proposed development will provide a substantial benefit to ongoing food manufacturing operations at the CPUK campus through increased flood resilience, whilst not increasing the risk of flooding elsewhere.
- 8.1.2 The design has been carefully considered to make use of existing of existing kerblines and hardstanding where possible. Modelling was undertaken to demonstrate that this kerbing would be safe, without increasing flood risk elsewhere. The following conclusions can be drawn:
- Kerb replacement is proposed at the CPUK site in Staverton, Wiltshire to provide precautionary flood resilience measures.
 - The site has been subject to historic flooding and it is shown to have been subject to fluvial flooding, but CPUK have no record of this affecting the southern part of the site.
 - Review of Environment Agency and local data indicate that the site is at low risk of surface water flooding.
 - The site is in an area of possible groundwater emergence and reservoir inundation. Neither of these risks of flooding are considered relevant to the current proposals.
 - Flood control infrastructure is proposed to protect the existing buildings on the site in extreme events. This is considered as Water Compatible development and is appropriate to protect the site - the buildings FFL are above the predicted flood level and defences.
 - Site-specific hydrological and hydraulic modelling has been undertaken to provide a detailed picture of fluvial flood risk at the site and to inform the placement and height of the proposed flood control infrastructure.
 - It has been demonstrated that the proposed measures will meet the requirements of the NPPF and the provisions of the adopted Wiltshire Core Strategy.
- 8.1.3 There is widespread policy support for tackling the effects of climate change and improving flood resilience nationally and in Wiltshire. This requires appropriate flood infrastructure to be delivered in the right place in order to be effective.
- 8.1.4 The technical assessments that have been prepared in support of the planning application have demonstrated that there will be no adverse impacts on flood risk, amenity, pollution and the landscape and appearance of the area. Given the above, it is considered that the proposed development is in accordance with the adopted Wiltshire Core Strategy and would deliver substantial benefits to the ongoing operations of Cereal Partners UK.

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