

18/12/2025

**Environment Agency
Sustainable Places – Planning**

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

Re: Ref WX/2025/139447/01-L01 Planning ref: PL/2025/07023

Dear Lindsay,

Thank you for your letter dated 5 December 2025, setting out the Environment Agency's objection to the above application on the grounds that the originally submitted Flood Risk Assessment (FRA) did not adequately assess the impacts of the proposed flood gates and kerbing on flood risk to adjacent and downstream areas.

The FRA submitted in July stated that,

"It is not necessary to model a post-development scenario as the proposed mitigation measures are located outside of the 1% AEP plus 26% allowance for climate change extent. Modelling this scenario would result in no change to the flood extents or levels as the defences would not interact with the flood water."

We write to confirm that a updated Flood Risk Assessment (Revision B, dated 15 December 2025) has been prepared by Edenvale Young Associates Ltd and submitted in support of the application. This updated FRA addresses the matters raised in your consultation response, as summarised below.

1- Assessment of impacts on flood risk elsewhere,

The revised FRA is supported by bespoke site-specific hydrological and hydraulic modelling undertaken using an ESTRY-TUFLOW linked 1D-2D model. This modelling has been prepared specifically for the Staverton site and has been submitted to the Environment Agency under the chargeable advice service to confirm that it is fit for purpose.

The modelling assesses baseline (pre-development) conditions for the

following events:

- 5% AEP (1 in 20 year)
- 3.33% AEP (1 in 30 year)
- 1% AEP (1 in 100 year)
- 1% AEP plus 26% and 71% climate change allowances

The flood extents do not interact with the resilience measures for the return periods including the design event of 1 in 100 years return period plus 26% climate change allowance.

This is shown in the figures below. Figure 1 shows the maximum flood extents for the 1 in 100-year Return Period plus 26% Climate Change Allowance event for the existing conditions in the site. Figure 2 shows how the flood resilience measures are placed in relation to these flood extents.

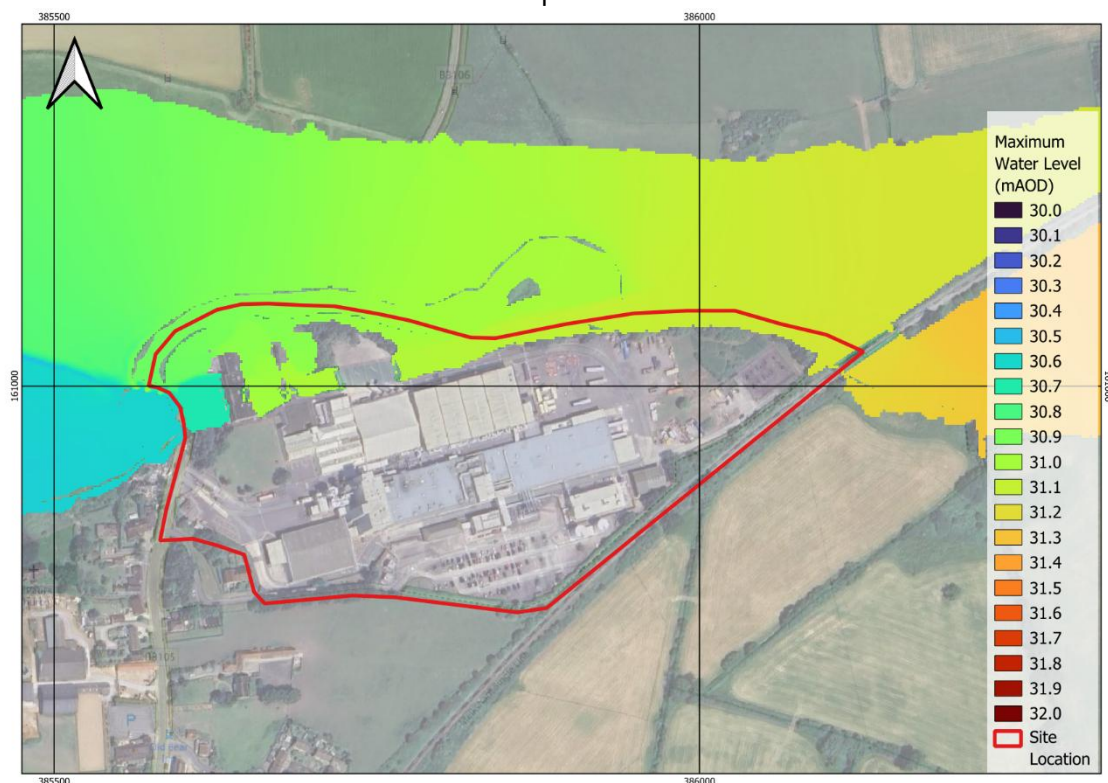


Figure 1- Baseline Maximum Water Levels 1 in 100-year Return Period plus 26% Climate Change Allowance

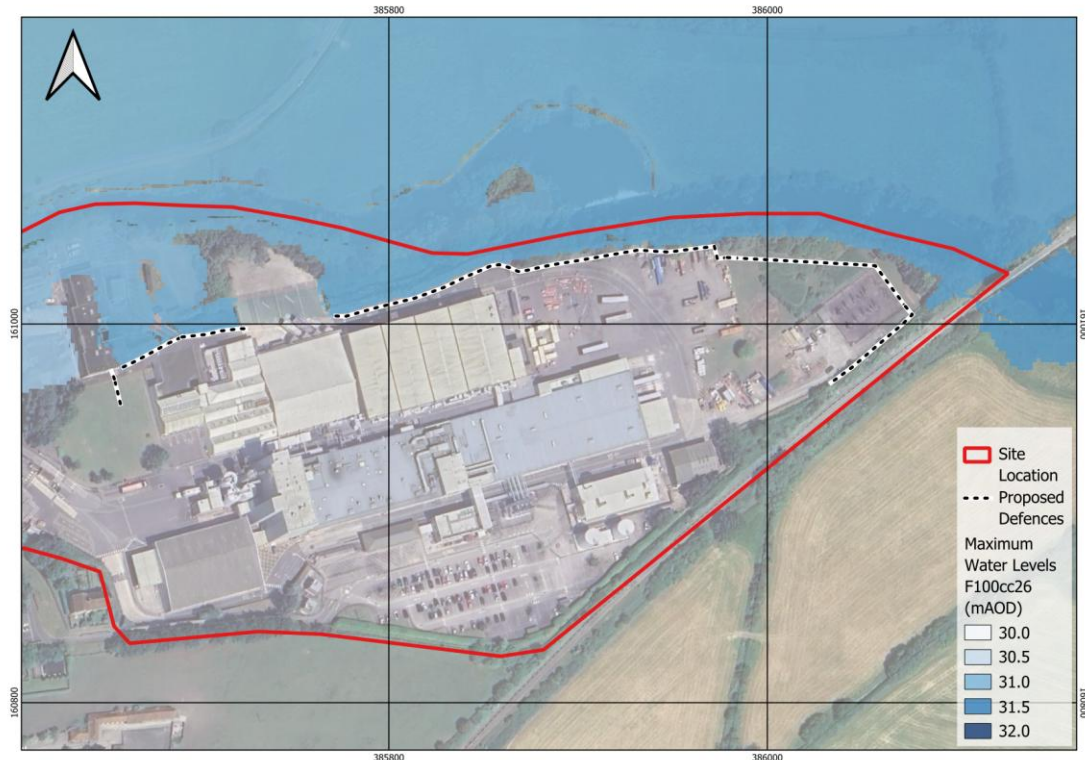


Figure 2: Flood defences location in relation to the design event maximum flood extents

The proposed measures do not interact with flood flows during the Design Flood Event and therefore do not impede flood conveyance. Post-development modelling is not required and would show no change to flood extents or levels, as the defences remain dry and result in no disbenefit.

2- Interaction of proposed measures with flood conveyance

The assessment demonstrates that:

- The proposed raised kerbs, flood gates and associated defences are located outside the modelled 1% AEP plus 26% climate change flood extent, which is identified as the appropriate Design Flood Event for water-compatible development.
- As a result, there is no interaction between flood flows and the proposed measures during the Design Flood Event, and therefore no impediment to flood conveyance.

- A post-development hydraulic model scenario is not required, as confirmed in Section 5.3 of the FRA, because the proposed defences do not come into contact with floodwater during the Design Flood Event and would result in no change to flood extents, flood levels or flow routes.
- The main service yard to the north of the Weston Cut will continue to flood during extreme events, ensuring that floodplain storage is retained and that floodwater is not displaced elsewhere.

Accordingly, the proposals do not increase flood risk to adjacent or downstream areas, in line with the requirements of the National Planning Policy Framework.

3- Compliance with national and local policy

Section 7 of the updated FRA confirms that the proposals:

- Are classed as Water Compatible development in accordance with Annex 3 and Table 2 of the NPPF.
- Result in no net loss of floodplain storage.
- Do not impede flood flows and do not increase flood risk elsewhere.
- Are designed using a precautionary approach, with defence crest levels set at 32.0 mAOD, providing a minimum of 300 mm freeboard above the modelled 1% AEP plus 71% climate change water level.
- The FRA therefore demonstrates compliance with both the NPPF and the Wiltshire Council Strategic Flood Risk Assessment.

The Flood Risk Assessment originally submitted with the application set out that the proposed measures would not interact with flood flows during the Design Flood Event and would not impede flood conveyance. However, it is acknowledged that this might not have been articulated as clearly as intended, and we apologise if this lack of clarity led to any uncertainty.

To address this, a revised Flood Risk Assessment has now been issued, which more explicitly addresses the points raised in your objection letter, including the requirement for comparative baseline assessment and consideration of potential

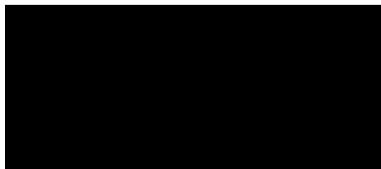
impacts on flood conveyance.

For clarity, the submitted FRA is supported by two key appendices:

- Appendix A, which contains the detailed design drawings for the proposed flood resilience measures; and
- Appendix B, which comprises the hydraulic modelling report, including its own supporting appendices setting out the model build, assumptions and results in full.

On this basis, it is considered that the Environment Agency's objection can now be withdrawn. We would welcome confirmation that the revised FRA is acceptable. Should you require any further clarification or additional information, please do not hesitate to contact us.

Yours sincerely,



Maria F. Jarquin, MEng, MSc, CEng, MICE
Director
Edenvale Young Associates