

Wiltshire Council

Reference: PA-0003956/01

Customer reference: PL/2026/01431

01 June 2026

Erect health, fitness and racquets club, including three outdoor tennis courts within enclosed air dome structure, three outdoor padel courts enclosed within canopies, indoor and outdoor swimming pools, outdoor multi use court, outdoor battle box exercise facility, external spa garden, child activity area, lounge facilities including a business hub and terrace, together with ancillary facilities, car parking, servicing, landscaping and associated works

**SOUTHPOINT BUSINESS PARK (PLOT 100) , A350 WEST CEPEN WAY / N4528,
CHIPPENHAM**

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

We have reviewed the following documents:

- Flood risk assessment and SUDS strategy (parts 1-3) by Willis Hazell Engineers, DLCH-WHE-XX-XX-RP-C-00001 dated 27th February 2026 revision A
- Proposed sections submitted 2nd March 2026
- Location plan submitted 2nd March 2026
- Existing site plan submitted 2nd March 2026
- Proposed site plan submitted 2nd March 2026
- Proposed ground floor submitted 2nd March 2026

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 associated Planning Practice Guidance (PPG). We recommend that planning permission is refused on this basis.

Reasons

This site lies within precautionary Flood Zone 3b, as defined in the '*Wiltshire Council Level 1 Strategic Flood Risk Assessment, written by JBA consulting, dated November 2024*'. The SFRA takes a precautionary approach to designating Flood zone 3b at this location as detailed modelling is not available, therefore flood zone 3 in its entirety is classed as precautionary flood zone 3b until further evidence is provided.

The NPPF [Annex 3: Flood risk vulnerability classification](#) classifies development types according to their vulnerability to flood risk. PPG [Table 2: Flood risk vulnerability and flood zone 'incompatibility'](#) provides guidance on which developments are incompatible with certain Flood Zones. The development is classed as 'Less Vulnerable' in line with the NPPF, Table 2 makes it clear that this type of development is not suitable in Flood Zone 3b.

Overcoming objection 1

To overcome our objection the applicant must suitably demonstrate that the development is not within Flood Zone 3b and is therefore acceptable in line with national policy this may involve modelling.

Objection 2 - Inadequate Flood Risk Assessment

In the absence of an adequate Flood Risk Assessment (FRA), we object to this application and recommend that planning permission is refused.

Reason(s)

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 associated FRA checklist. The FRA does not therefore adequately assess whether the development will be safe for its lifetime or whether it will increase flood risk elsewhere.

In particular, the FRA fails to:

Provide a robust assessment of flood levels and risk to the development:

- The FRA does not define design flood levels for the site (e.g. 1% AEP event including climate change). Please note that a design flood level is not known for this site so a conservative level should be agreed for the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change.
- There is no comparison between predicted flood levels and proposed Finished Floor Levels (FFLs) and therefore no freeboard allowance is identified.

Provide clear details in regard to ground level changes:

- There is mention of lowering sites around the perimeter to divert flood flows, this hasn't been assessed if this will increase flood risk on site or to the surrounding

areas. There is no assessment of how much proposed change in floodplain storage and if level for level compensation will be required as a result of the new buildings as well as the altering of ground level.

- There are no proposed levels/ cross sections or plans which illustrate the proposed ground altering works.

Properly address climate change impacts on flood risk:

- Although climate change allowances are applied to the surface water drainage design, The FRA does not apply climate change allowances to fluvial flood levels.

Overcoming objection 2

To overcome our objection, 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 if a revised FRA is submitted

Note to LPA

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will 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)

+442030251229

wx.sp@environment-agency.gov.uk

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