

Technical Note 002		
Project Name and number:	Land off Scotland Road, Melksham	D2424
Subject:	Response to Planning Consultation (EA)	
Client:	Brant Storage	
Prepared by and Date:	MJA	20/07/2026



BP Civils has previously prepared a Flood Risk Assessment and Drainage Strategy (D2424 FRA 1.0, dated February 2026) in relation to the retrospective application for the storage of up to 72 No storage units on the former car park area of cooper tyres. A planning application was submitted to Wiltshire Council ref: PL/2025/09205.

The EA has commented, dated 2nd April 2026:

In the absence of an adequate flood risk assessment (FRA) we maintain our objection to this application and recommend that planning permission is refused.

Reason

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:

- *Assess the impact of the storage containers on flood flow routes across the site.*

Although the drawings show a 200mm freeboard beneath the storage containers, we require site specific flood depth information to determine whether this clearance is sufficient to avoid impeding flood flows.

Furthermore, any containers located within 6m of the top of the riverbank must be moved to achieve a minimum 8m offset. This is necessary both to protect the stability of the bank and to avoid increasing flood risk.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

BP Civils Response

In view of the Environment Agency's request for additional information, EPS were commissioned to prepare a technical report analysing the flood risk for the site. The 2D flood modelling data supplied by The Environment Agency has been appraised in their report ref:4688/16th June 2026, 1st Issue.

With reference to page 12 this concludes the entire site is located outside the flood extents under the provided scenarios, including the exceedance event.

Furthermore the EPS report recommends mitigation as follows:

- In the first instance, it is recommended that the storage containers are raised 600mm above the existing ground levels. Freeboard should be used to create a void to allow any potential floodwater to flow freely beneath the storage contained and not be displaced elsewhere.
- In addition, in order for the proposals to meet the requirement of the EA's 8m buffer zone between the riverbank, it has been recommended that the proposed storage containers be positioned behind this 8m easement as demonstrate on Figure 9 above.

In light of the above, new drawing 1880/DP05 has been provided to demonstrate the 8m buffer clearance and new drawing 1880/DP06 to demonstrate the 600mm freeboard.

Enc

4688/16th June 2026, 1st Issue – EPS Technical Note

1880/DP05 - Site Plan Layout

1880/DP06 - Elevations



Technical Note: Land off Scotland Road, Melksham

Author(s): Katheryn Taylor BSc (Hons) GradCIWEM

Technical Review: James Asquith BSc (Hons) GradCIWEM

Authorised: Adam Babb BSc (Hons) MSc MCIWEM

Project: 4686 – Land off of Scotland Road, Melksham, SN12 8AJ

Date: 16 June 2026

Revision: 1st ISSUE

1. Scope of Appraisal

- 1.1. Environmental Protection Strategies (EPS) Ltd has been commissioned by Brant Storage & Removals Ltd to prepare a technical report analysing the flood risk for the site at Land off Scotland Road, Melksham, SN12 8AJ.
- 1.2. In this case, a Flood Risk Assessment (FRA) report has been previously undertaken in February 2026 in support of the development site and has been submitted as part of a planning application (PL/2025/09205). However, since this, the Environment Agency (EA) have provided a response in March 2026 (WX/2026/139591/02-L01) to which they have objected to this planning application, giving the below reason:

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:

- *demonstrate whether the design of the proposed block pads to elevate 72no storage containers will adequately allow free passage of water to flow during flood events.*
 - *Consider how a range of flooding events (including extreme events) will affect the security of the containers to ensure they will not be displaced and potentially cause a blockage in the river channel.*
 - *Consider how the additional weight would impact the bank stability as the proposed containers are within 8m of the river bank.*
- 1.3. From this, the site-specific flood model data has been requested by the EA, which has been provided as 2D Flood Modelling data. The aim of this technical note is to appraise the flood model data given by the EA, in order to understand the risk of flooding to the site over a range of flood scenarios and to set out any relevant recommendations to overcome the EA's objection comments.



2. Background Information

- 2.1. The site is located at OS coordinate 390516, 164552 off Scotland Road in Melksham. The site covers an area of approximately 0.24 hectares (ha) and is currently in use as a paved yard.
- 2.2. The proposals for development comprise the construction of 72no. storage containers. As such, the proposals are classified as 'less vulnerable' development. The location of the site with regards to the surrounding area and the River Avon is shown in Figure 1.

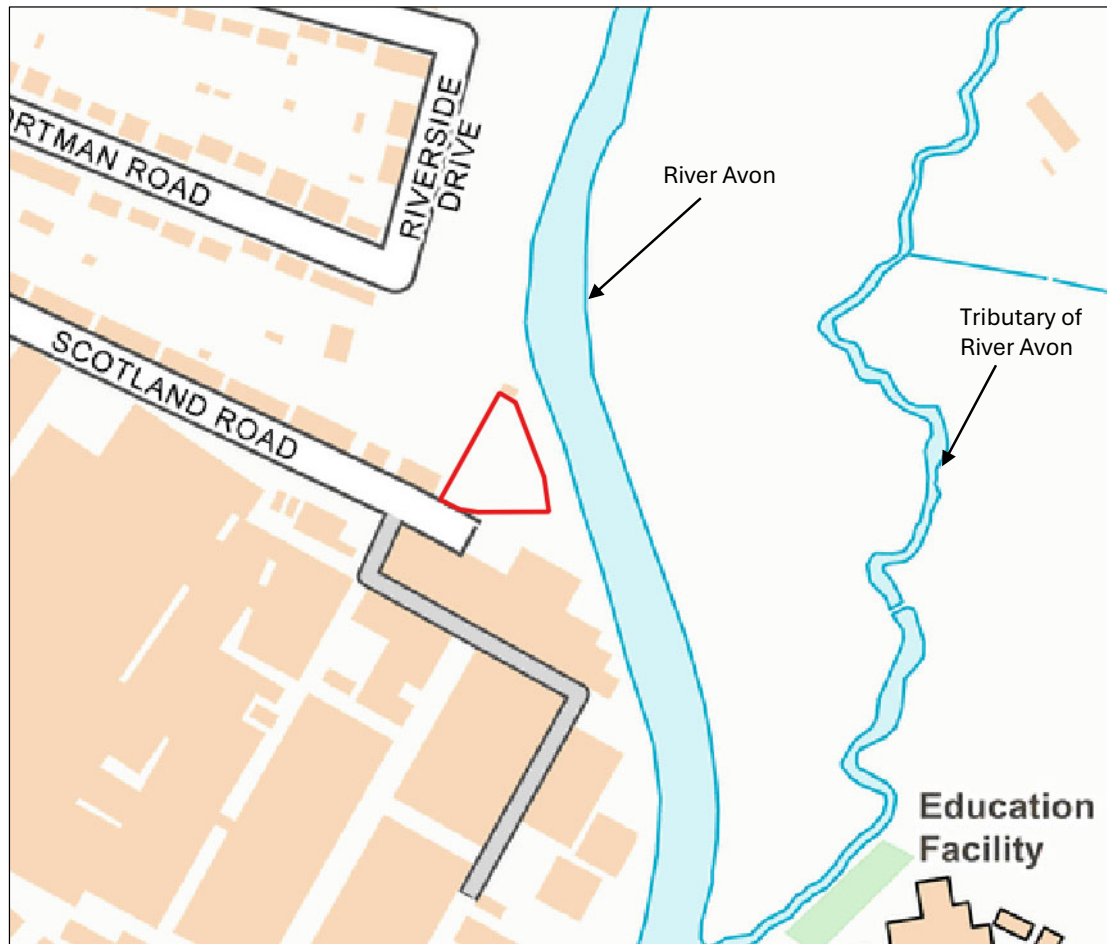


Figure 1 – Location map (contains Ordnance Survey data © Crown copyright and database right 2026).

- 2.3. In this case, a topographical survey has been undertaken for the site, and a copy of this is included in Appendix A. From this, it can be seen that land levels of the site vary between 35.36m and 35.66m Above Ordnance Datum Newlyn (AODN). Further review of the topographical survey indicates that overall, land levels fall in an eastern direction, towards low-lying land. Figure 2 below displays the topography of the wider area, incorporating the EA's 1m resolution LiDAR data. Areas of lower lying land can be seen to the east of the site, with the site itself being shown to be raised above the land to the east adjacent to the River Avon.

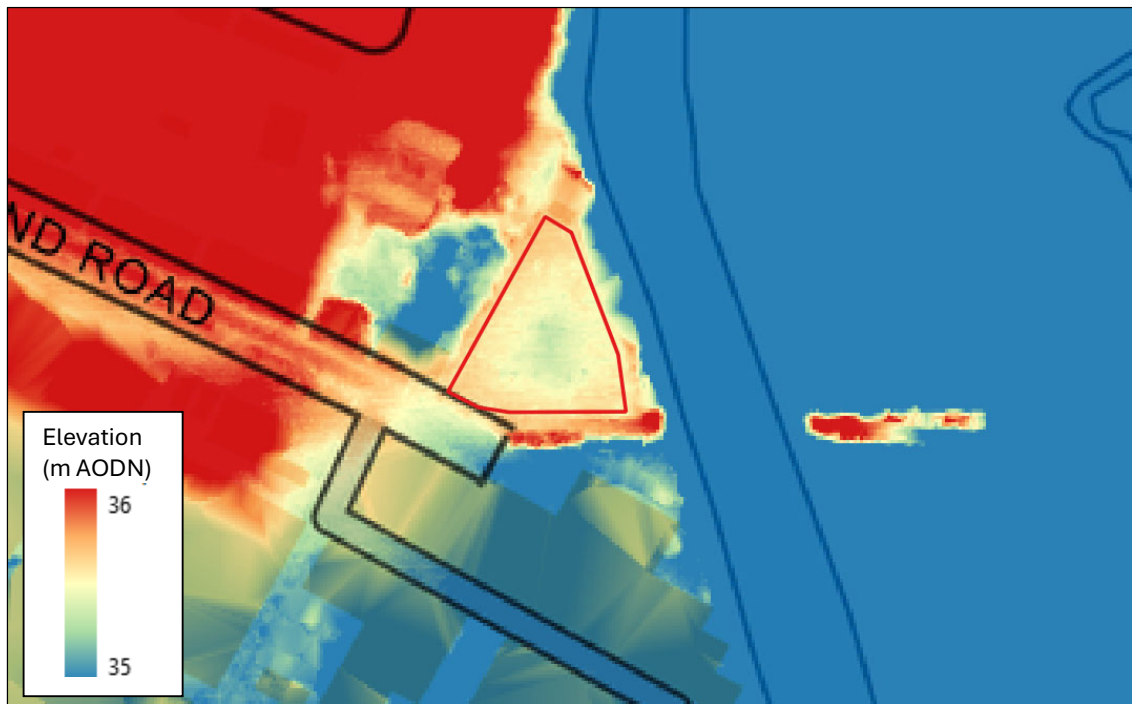


Figure 2 – EA's 1m resolution LiDAR data (© Environment Agency, mapping contains Ordnance Survey Data © Crown copyright and database right 2026).

3. Planning Policy and Context

- 3.1. Inspection of the Environment Agency's (EA) 'Flood Map for Planning' (Figure 3) identifies that the site is located within Flood Zone 2 and therefore, as required within the National Planning Policy Framework (NPPF), it has been necessary to appraise the risk of flooding to the site in detail.

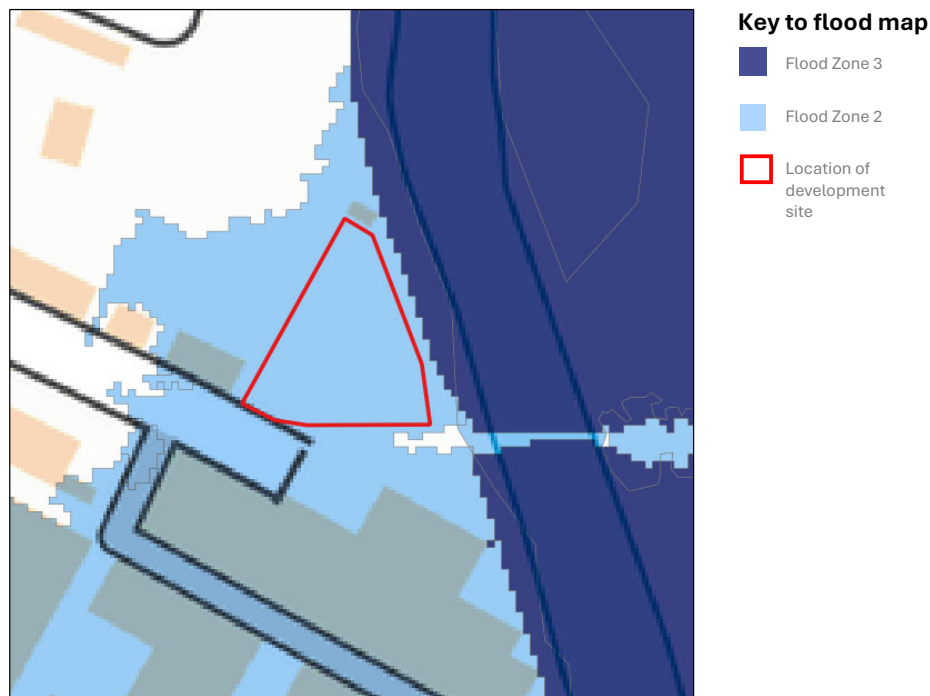


Figure 3 – Flood zone map showing the location of the development site (© Environment Agency, mapping contains Ordnance Survey Data © Crown copyright and database right 2026).

- 3.2. Interrogation of Ordnance Survey (OS) mapping reveals that the River Avon is located in approximately 6.9m to the site at the closest point. Further review of the EA's 'Flood Map for Planning' mapping shows that the site is at risk of flooding from the River Avon. Consequently, the risk of fluvial flooding from the River Avon has been appraised for a series of flood events below.

4. Climate Change

- 4.1. To ensure that any recommended mitigation measures are sustainable and effective throughout the lifetime of the development, it is necessary to base the appraisal on climate change predictions that are commensurate with the planning horizon for the proposed development. The NPPF and supporting Planning Practice Guidance Suite state that the lifetime of a non-residential development depends on the characteristics of the development. The development that is the subject of this assessment is for storage containers and therefore is classified as commercial and consequently, a design life of 75 years has been assumed.
- 4.2. Recognising that the impact of climate change will vary across the UK, the allowances show the anticipated changes to peak flow by management catchment. Management catchments are sub-catchments of river basin districts.
- 4.3. The proposed development site is covered by the **Severn River Basin District**, as defined by the EA 'River Basin District' maps, and is located in the **Avon Bristol and North Somerset Streams Management Catchment**, as defined on the EA's 'Peak River Flow' map. For each epoch there are three climate change

allowances defined. These represent different levels of statistical confidence in the possible emissions scenarios on which they are calculated. The three levels of allowance are as follows:

- Central: based on the 50th percentile
- Higher Central: based on the 70th percentile
- Upper End: based on the 95th percentile

- 4.4. The EA has provided guidance regarding the application of the climate change allowances and how they should be applied in the planning process. The range of allowance for the Management Catchment in which the development site is located are shown in Table 1 below.

Management Catchment Name (River Basin District)	Allowance Category	2020s	2050s	2080s
Avon Bristol and North Somerset Streams	Upper End	27%	38%	71%
	Higher Central	15%	19%	39%
	Central	10%	12%	26%

Table 1 Recommended peak river flow allowances for each epoch for the Avon Bristol and North Somerset Streams Management Catchment (1981 to 2000 baseline).

- 4.5. For less vulnerable development with a design life of 75 years in Flood Zone 2, a Central climate change allowance is recommended. From Table 1 above, it can be seen that the recommended climate change allowance for this site is a 26% increase for all peak river flows.

5. Actual Risk of Fluvial Flooding

- 5.1. In this case, BP Civils requested site-specific flood level information from the EA, and the EA have provided 2D Flood Modelling data for the Melksham Mapping and Modelling Study (2025). This data has been passed onto us (EPS) and has been referenced as part of this appraisal.
- 5.2. Within their response, the EA have provided data for both the defenced and undefended scenarios. Review of the EA's 'Spatial Flood Defence' mapping reveals that there is existing flood defence infrastructure along the River Avon in the form of natural high ground to a standard of protection of the 1 in 10 year return period event, which provides protection to the site. Therefore, the defended flood scenarios have been considered for a range of flood events as the undefended events would provide an unrealistic representation of flooding to the site.
- 5.3. In order to overcome the EA's objections (as outlined in Section 1 above), it is necessary to appraise the risk of flooding at a site-specific scale, in line with a FRA. Therefore, the following sections consider a range of flood scenarios which are typically considered within a FRA report.

5.4. The Functional Floodplain Event

- 5.4.1. One scenario which needs to be considered as part of a FRA is the functional floodplain event. The NPPF defines this event as land where water has to flow or be stored in times of flood during events that have a probability of occurrence of the 1 in 30 year return period event (3.33%) or greater in any one year.
- 5.4.2. In this case, the data provided within the EA's response has included flood model data during the 1 in 30 year return period event, and the results show that under this scenario the entire site is located outside of the flood extents (Figure 4). Therefore, it can be concluded that the site is not located within the functional floodplain.

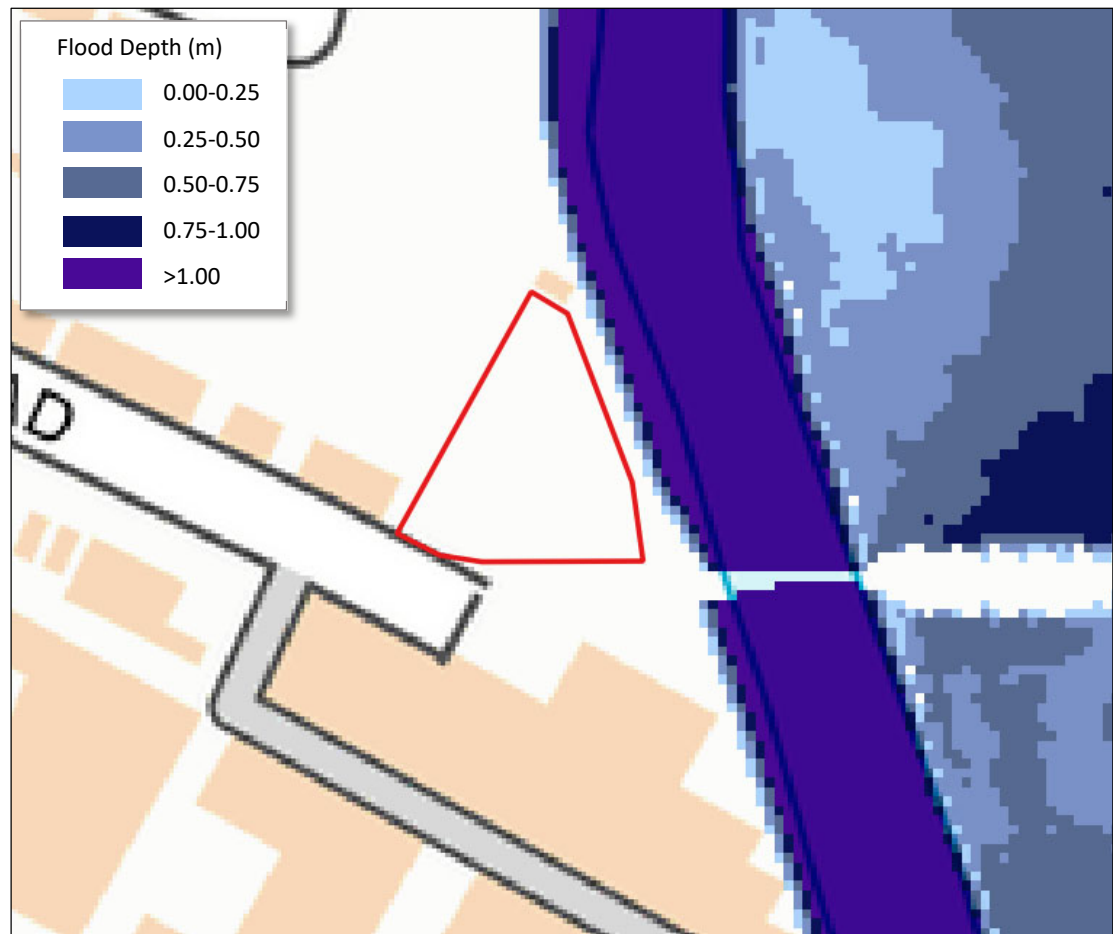


Figure 4 - Maximum predicted extent and depth of flooding during the functional floodplain. (© Environment Agency - contains Ordnance Survey data © Crown copyright and database right 2026).

5.5. The Current Day Flood Event

- 5.5.1. In addition to the functional floodplain, it is also necessary to consider the impact of flooding to the site under current day scenarios. In this case, as the site is shown to be potentially at risk of flooding from the fluvial River Avon, the 1 in 100 year return period event is considered appropriate.

- 5.5.2. Review of the data given reveals that the EA has provided flood level and depth data for the 1 in 100 year return period event. Under this scenario, the results show that the entire site remains outside of the flood extents (Figure 5). Therefore, it can be concluded that the site is located outside of the current day flood extents.

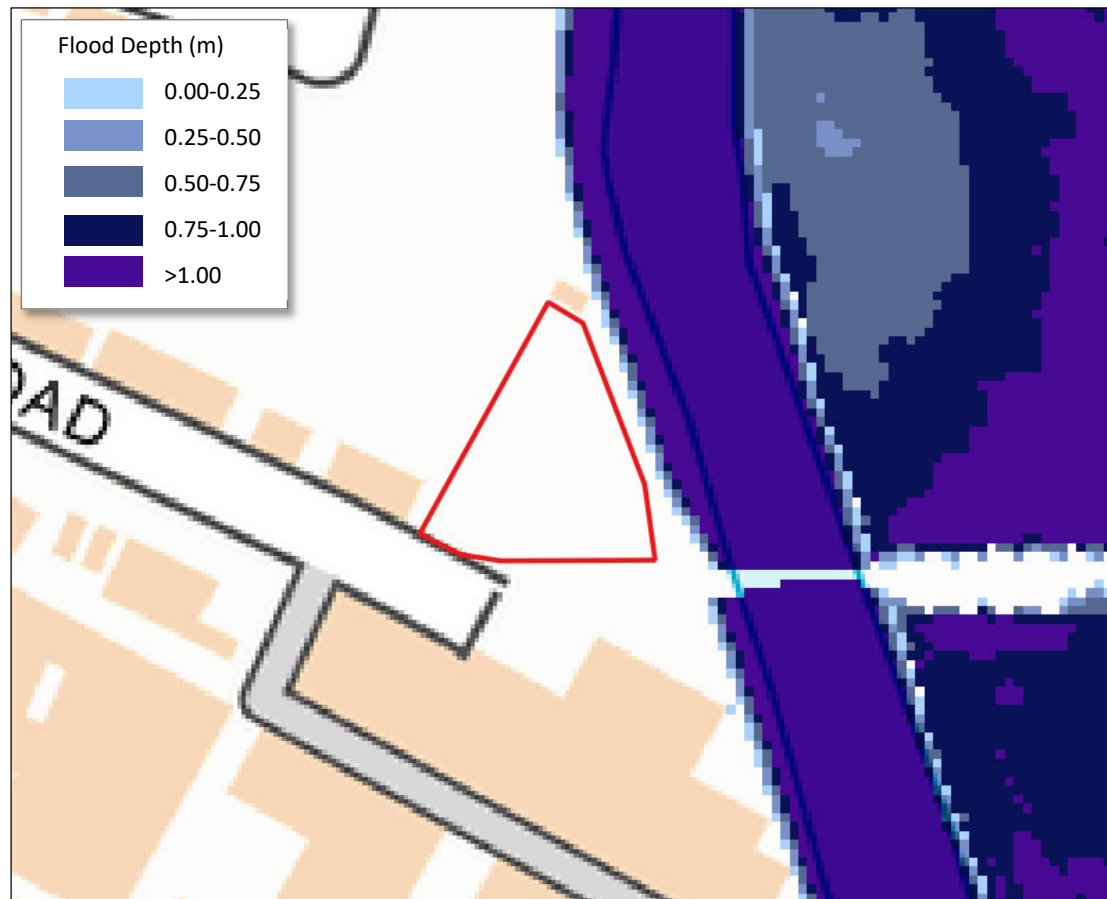


Figure 5 - Maximum predicted extent and depth of flooding during the current day scenarios. (© Environment Agency - contains Ordnance Survey data © Crown copyright and database right 2026).

5.6. The Design Flood Event

- 5.6.1. When appraising the risk of flooding to new development it is further necessary to assess the impact of climate change on the proposed development to ensure that it is suitable for the design lifetime (i.e., the design flood event). For fluvial flooding, the design flood event is taken as the 1 in 100 year (1% AEP) event for fluvial flooding, including an appropriate allowance for climate change.
- 5.6.2. In this case, review of Table 1 reveals that the 1 in 100 year return period event plus 26% allowance for climate change is considered appropriate for the design flood event. Review of the data provided by the EA reveals that this flood event has been given, and the results show that even when an allowance for

climate change is considered the entire site is identified to remain dry (Figure 6). Consequently, it can be considered that the actual risk of flooding to the site is *low*.

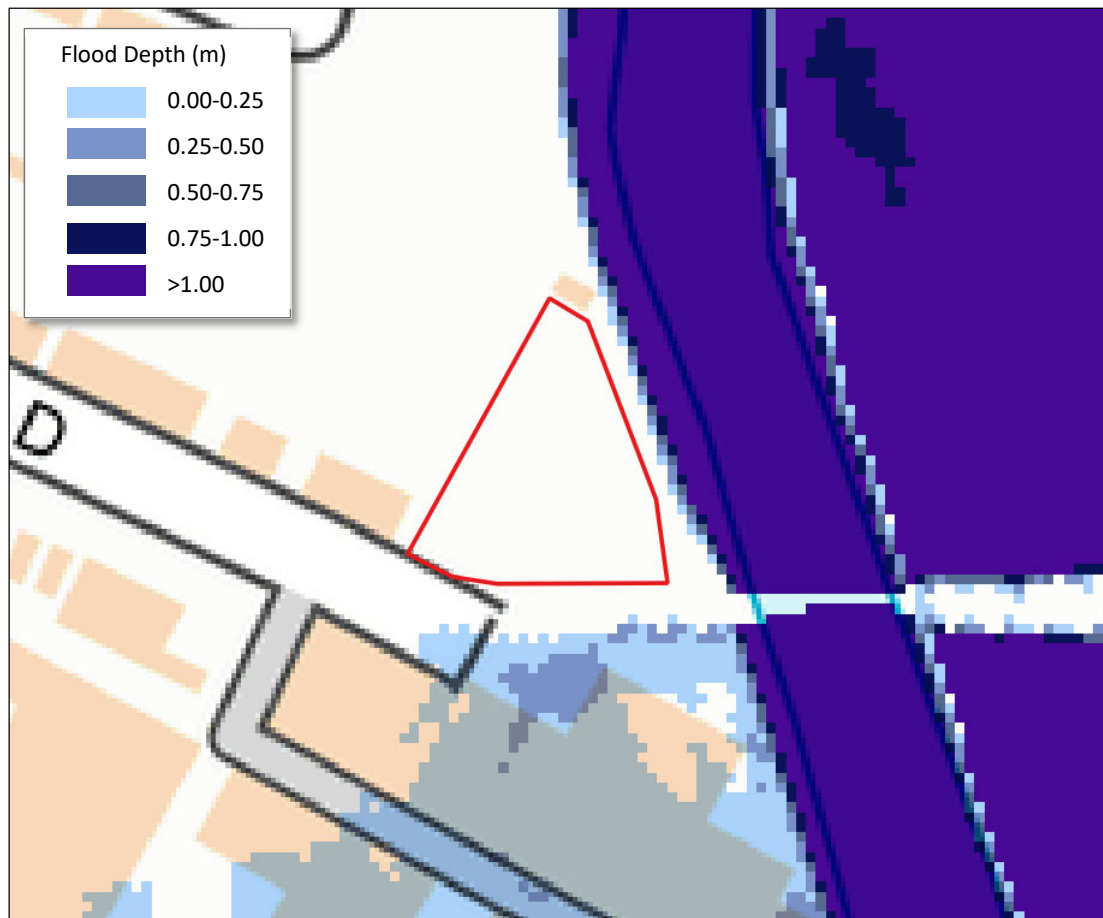


Figure 6 - Maximum predicted extent and depth of flooding during the design flood event. (© Environment Agency - contains Ordnance Survey data © Crown copyright and database right 2026).

6. Residual Risk of Fluvial Flooding

6.1. The Exceedance Flood Event

- 6.1.1. In addition to the above, it is also necessary to consider the impact of a flood event that exceeds the design flood event (i.e., the exceedance event). This is instance, the 'Higher Central' allowance for climate change has been considered as an exceedance event, i.e., the 1 in 100 year return period event including 39% allowance for climate change (refer to Table 1).
- 6.1.2. The data provided by the EA as part of their response additionally includes flood model data for this event and the results show that even during an extreme exceedance event, the entire site is shown to be located outside of the flood extents (Figure 7). Consequently, it can be considered that the risk of flooding to the site under an exceedance event is *low*.

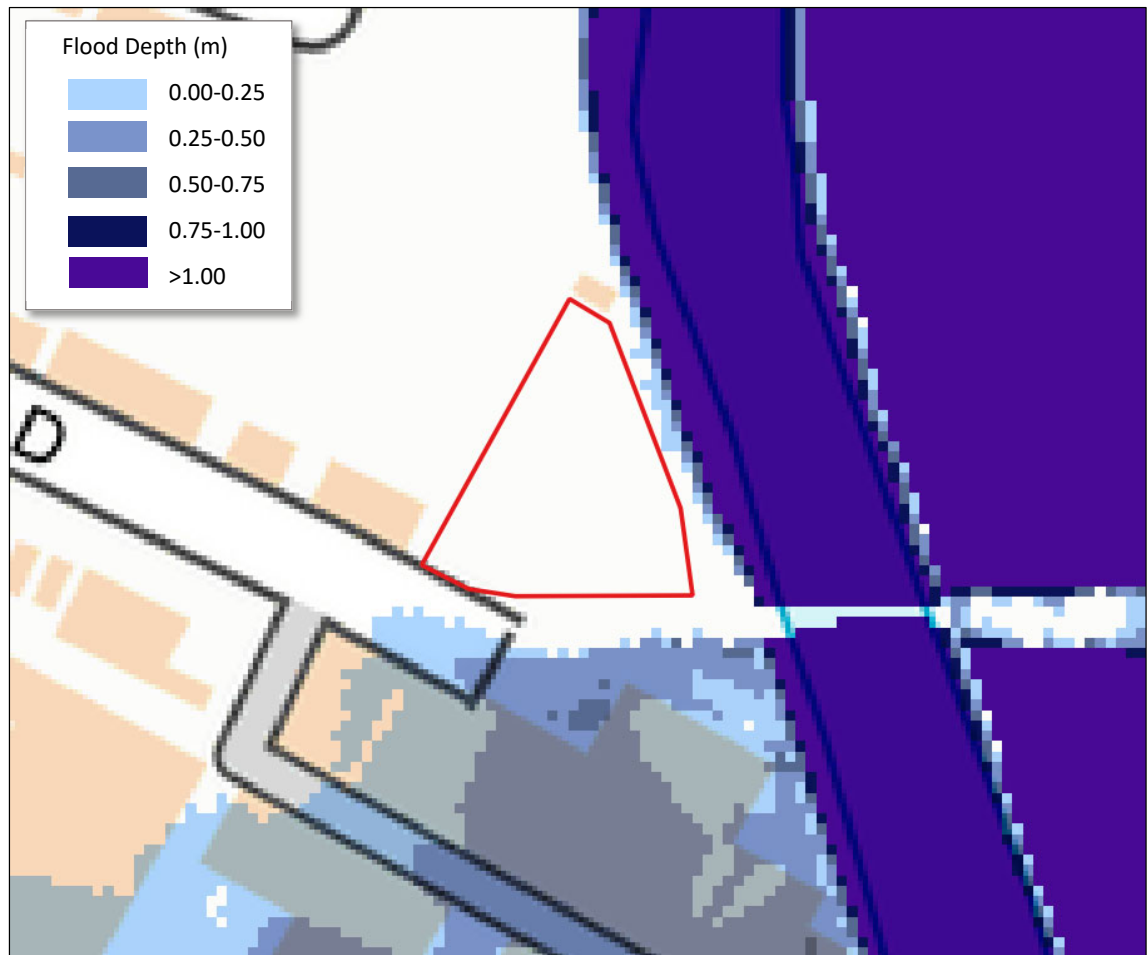


Figure 7 - Maximum predicted extent and depth of flooding during the exceedance event. (© Environment Agency - contains Ordnance Survey data © Crown copyright and database right 2026).

6.2. The 1 in 1000 year return period flood event

- 6.2.1. As Figure 3 identifies that the site is located within Flood Zone 2, it is also necessary to appraise the risk of flooding from the 1 in 1000 year return period event. Whilst this flood event is considered to significantly overestimate the risk of flooding to the site, in order to overcome the EA's objections, the 1 in 1000 year return period event has been appraised as a precautionary approach to fully understand the risk of flooding to the site.
- 6.2.2. The results under this scenario show that the entire site could flood to a predicted flood level of between 35.70m and 35.75m AODN (Figure 8). When this is compared to land levels onsite within the topographical survey, the results show that the site could flood to a predicted depth of **0.04m - 0.38m**.

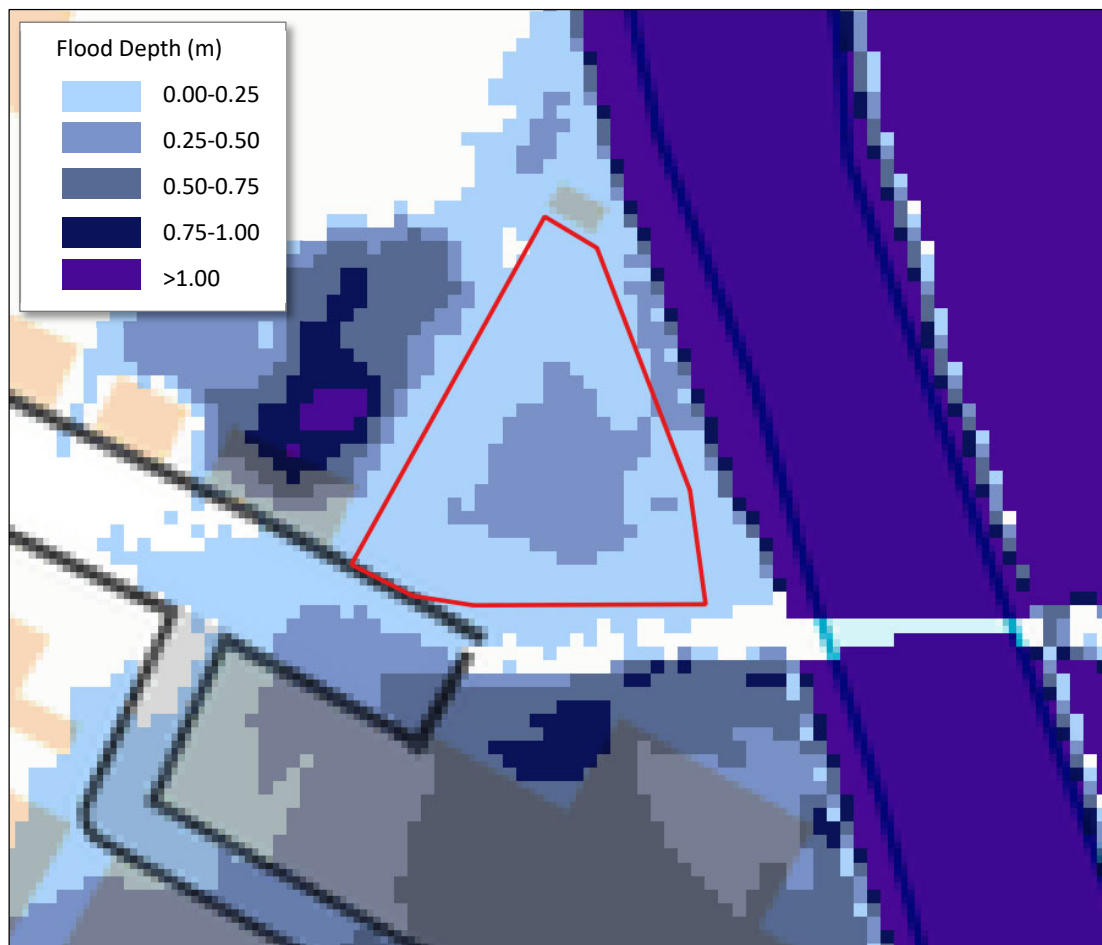


Figure 8 - Maximum predicted extent and depth of flooding during the 1 in 1000 year return period flood event (i.e., Flood Zone 2).
(© Environment Agency - contains Ordnance Survey data © Crown copyright and database right 2026).

7. Flood Mitigation Measures

7.1. From the results above, it has been identified that the entire site is located outside of the flood extents from the River Avon under the considered flood events up to and including the exceedance flood event. However, the above analysis demonstrates that the entire site could be at risk of flooding under the 1 in 1000 year return period event (i.e., Flood Zone 2). Whilst this extreme flood event is considered unlikely to occur, in order to overcome the EA's objections this flood event has been considered within the following flood mitigation measures recommended below;

7.2. Raising the Freeboard Beneath the Storage Containers

7.2.1. In this instance, the above results reveals that the entire site is located outside of the flood extents under the flood extents up to and including the 1 in 100 year return period event including 39% allowance for climate change (i.e., the exceedance event). However, the results have shown that the site is at risk of flooding under the 1 in 1000 year return period event. Therefore, it is recommended that the proposed storage containers are raised above the flood level.

- 7.2.2. As identified in Section 6.2.2 above, the depth of flooding onsite is shown to vary between 0.04m and 0.38m under the 1 in 1000 year return period event. Therefore, it is recommended that the storage containers are raised proportionately with the existing ground levels respective to their location onsite. As the maximum flood depth onsite is found to be 0.38m, best practice would recommend that all the storage containers are raised 600mm above the existing ground level to ensure that the containers are raised above the maximum predicted flood level.
- 7.2.3. However, review of the topographical survey reveals that raising the storage containers by 600mm could be significant in some locations onsite and therefore, there may be limited opportunity to incorporate this into the entirety of the design scheme. If this is not possible in the first instance, it is alternatively recommended that for the storage containers located within the light blue extents (i.e., depths between 0.0m and 0.25m of flooding) shown in Figure 8 above should be raised to a minimum of 400mm above the existing ground level. In addition to this, for any proposed containers located within the darker blue extents (i.e., depths between 0.25m and 0.50m of flooding) are recommended to be raised 600mm above the existing ground floor level. The use of freeboards should be implemented to raise the storage containers to the heights recommended above which would create voids to allow floodwater to flow naturally underneath the storage containers and not be displaced elsewhere.

7.3. Proximity to Watercourse and Flood Defence Structures

- 7.3.1. Under the Water Resources Act 1991 and Land Drainage Byelaws, any proposals for development in close proximity to a 'main river' would need to take into account the EA's requirement for an 8m buffer zone between the riverbank and any permanent construction such as buildings or car parking etc.
- 7.3.2. This buffer allows access for maintenance, to provide biodiversity opportunities and also to provide room for the riverbanks to erode without threatening any development. Consequently, prior consent of the EA is required for any development within the byelaw distance, and this consent is in addition to planning permission.
- 7.3.3. In this case, within the response to the previous planning application the EA have raised concerns over the impact of the proposed storage containers located within the 8m buffer zone. In addition, review of the EA's 'Spatial Flood Defence' mapping reveals that the site is located approximately 6m from the defence infrastructure along the River Avon. Therefore, it is recommended to re-locate the proposed storage containers to achieve a minimum of 8m easement in accordance with the EA's requirements. Figure 9 below shows the location of the 8m easement from the flood defence infrastructure along the River Avon for the proposed storage containers to be relocated behind;

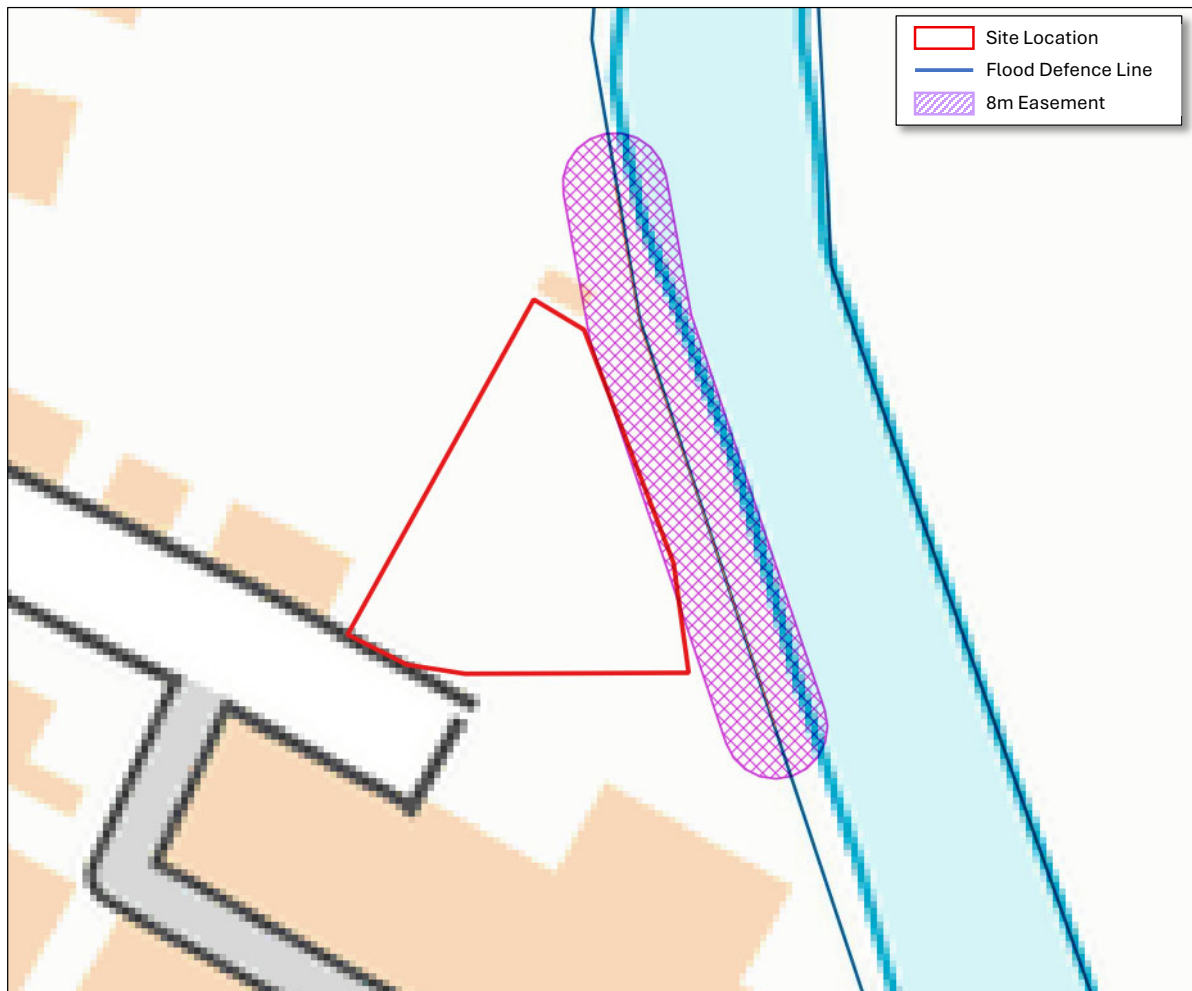


Figure 9 – Location of site in relation to the flood defence infrastructure and the 8m easement along the site outlined in green. (Contains Ordnance Survey data © Crown copyright and database right 2026).

8. Concluding Remarks

- 8.1. The above analysis within this Technical Note has been undertaken to understand the risk of flooding from the fluvial River Avon to the site over a range of flood events, in order to overcome the EA's objection comments to the previous application. Flood model data has been requested by BP Civils from the EA and passed onto EPS. In this case, the Melksham Mapping and Modelling Study (2025) has been provided and appraised to assess the risk of flooding to the site. The results have demonstrated that the entire site is located outside of the flood extents under the provided scenarios, up to and including the exceedance flood event.
- 8.2. Notwithstanding this, the above analysis has shown that the entire site is at risk of flooding under the extreme 1 in 1000 year return period flood event (i.e., Flood Zone 2). Whilst this flood event is considered to significantly overestimate the risk of flooding onsite and is considered unlikely to occur, in order to

overcome the EA's objections, this flood event has been considered within the following mitigation measures and recommendations ;

- In the first instance, it is recommended that the storage containers are raised 600mm above the existing ground levels. Freeboard should be used to create a void to allow any potential floodwater to flow freely beneath the storage containers and not be displaced elsewhere.
- In addition, in order for the proposals to meet the requirements of the EA's 8m buffer zone between the riverbank, it has been recommended that the proposed storage containers be positioned behind this 8m easement as demonstrated in Figure 9 above.

APPENDICES

Appendix A – Topographical Survey

APPENDIX A – TOPOGRAPHICAL SURVEY

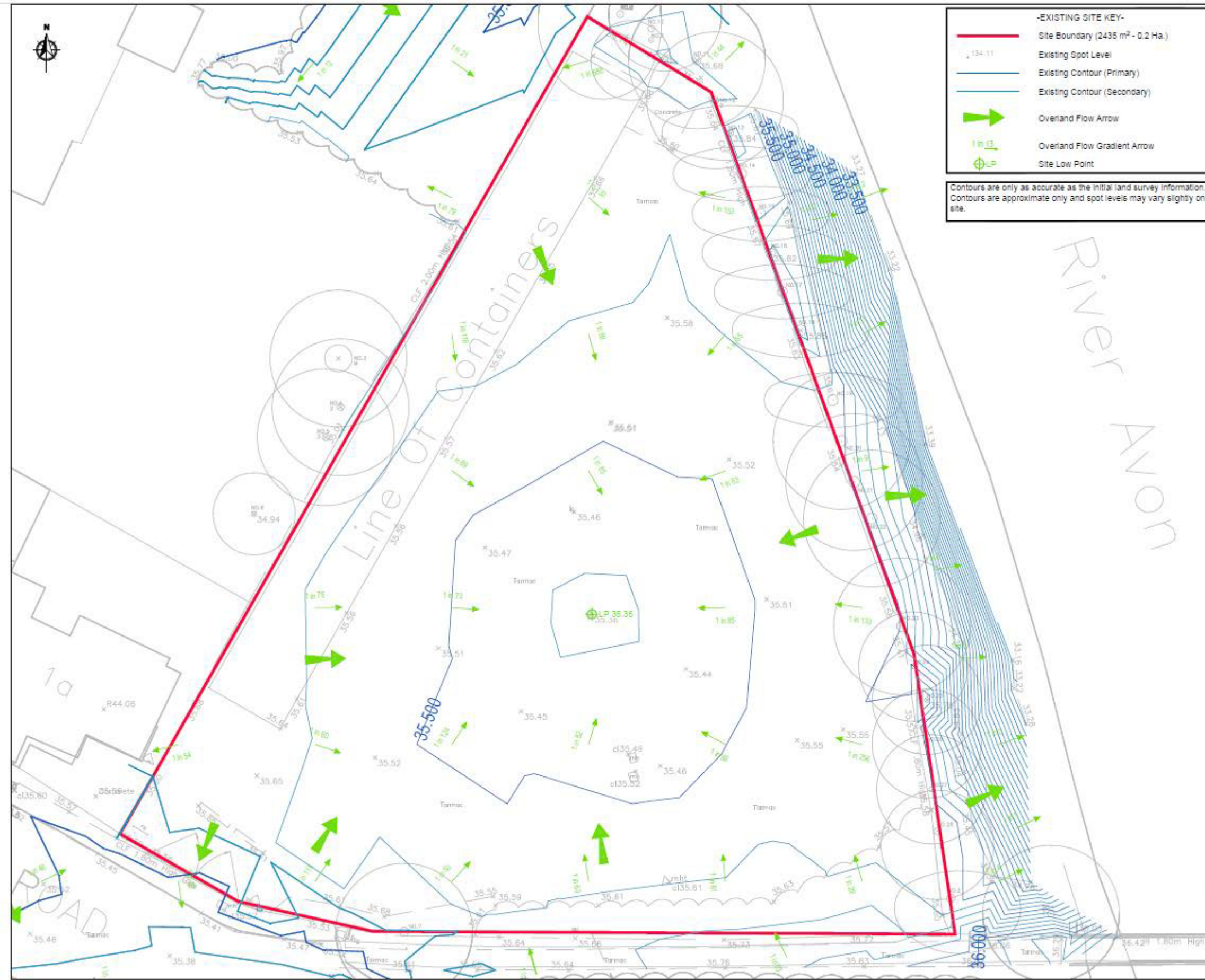
NOTES

1. This drawing is to be read in conjunction with all other BP Civils drawings, and with all relevant Architects and Engineer's drawings and specification. Any discrepancies found are to be reported immediately to the Engineer.
2. BP Civils accepts no responsibility for inaccuracies in data provided by third parties such as topographic surveys or Ordnance Survey mapping.
3. Do not scale, work to figured dimensions only. All dimensions are in millimeters unless noted otherwise and all levels are in metres from the topographic survey datum.
4. Any information given regarding existing underground services is given in good faith after consultation with the relevant authority, however accuracy is not certain. The main contractor is responsible for checking all information on site prior to work commencing and taking due care whilst undertaking the works.
5. All dimensions to be checked on site. All details and dimensions relating to sub-contractors work must be checked and agreed between the sub-contractor or supplier and the general contractor.
6. The electronic information from this drawing can not be guaranteed as dimensionally drawn exact. Figured dimensions must be used for setting out and detailing. BP Civils logo and company information must be removed from copies if information is re-used.
7. Where used, this map is based on or reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of His Majesty's Stationary Office (c) Crown Copyright. Licence number: 100022432. BP Civils accept no liability for any inaccuracies with the data.
8. The client shall ensure all licences, consents and approvals required to implement the works are in place prior to commencing construction.

-EXISTING SITE KEY-

- Site Boundary (2435 m² - 0.2 Ha.)
- Existing Spot Level
- Existing Contour (Primary)
- Existing Contour (Secondary)
- Overland Flow Arrow
- Overland Flow Gradient Arrow
- Site Low Point

Contours are only as accurate as the initial land survey information. Contours are approximate only and spot levels may vary slightly on site.



Original Issue	
Rev.	Date
Amendments	
BP CIVILS Civil Engineering and Transport Planning Consultants 2 West Barn, Norton Lane, Chichester, West Sussex PO20 3AF Tel: 01243 210418 www.bpcivils.co.uk enquiries@bpcivils.co.uk	
Drawing Status PLANNING NOT FOR CONSTRUCTION	
Client Brant Storage & Removals Ltd	
Project Brant Storage Yard Scotland Road, Melksham	
Drawing Title Topographic Survey with Contours	
Scale at A3	Date
1:250	Feb 26
Drawn By	Checked By
JHL	MJA
Project No.	D2424
Drawing Code	Drawing No.
000-BPC-WD-ZZ-D-C	PL002 P00
Rev.	



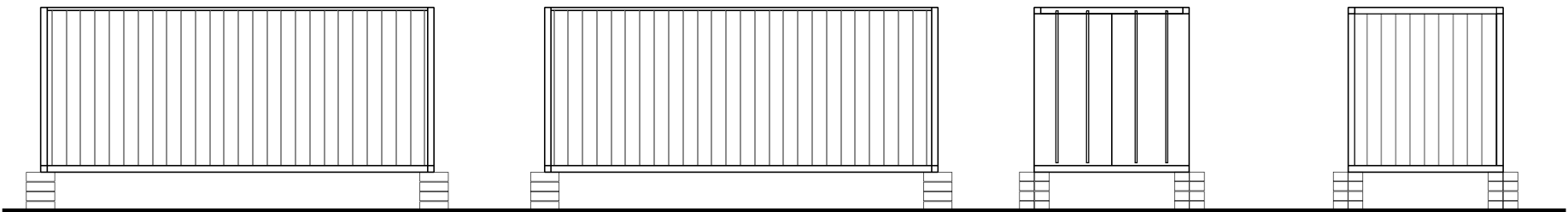
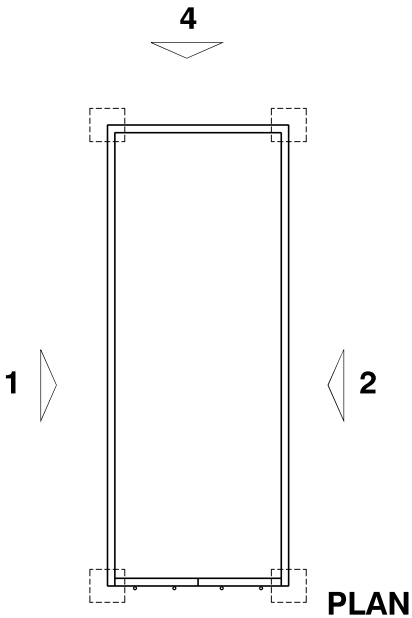
Storage Container
Typical Floor Plan and Elevations



Scale 1:100 @ A3

GIA APPRX. 12.9M2
RAL 6007 GREEN

ALL CONTAINERS ELEVATED BY 600mm
ON CONCRETE BLOCK PADS



ELEVATION 1

ELEVATION 2

ELEVATION 3

ELEVATION 4

A CCTV MOUNTED ON 2M POLE

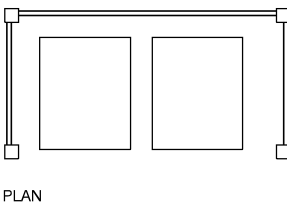
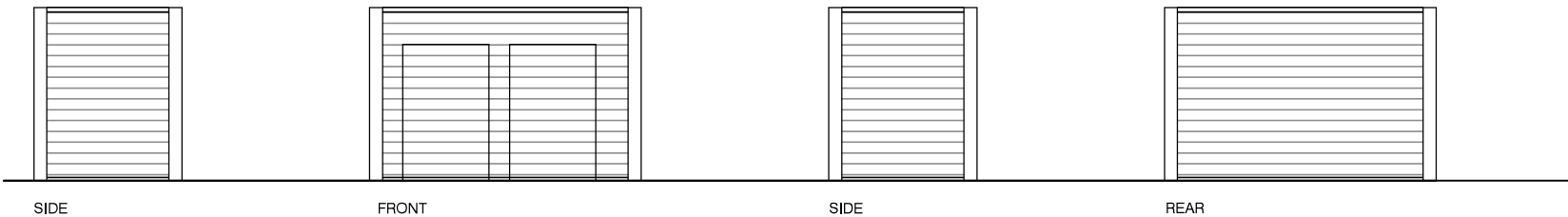
B LED SECURITY LIGHTING MOUNTED ON 0.6M POLE

Bin Store
Plan and Elevations

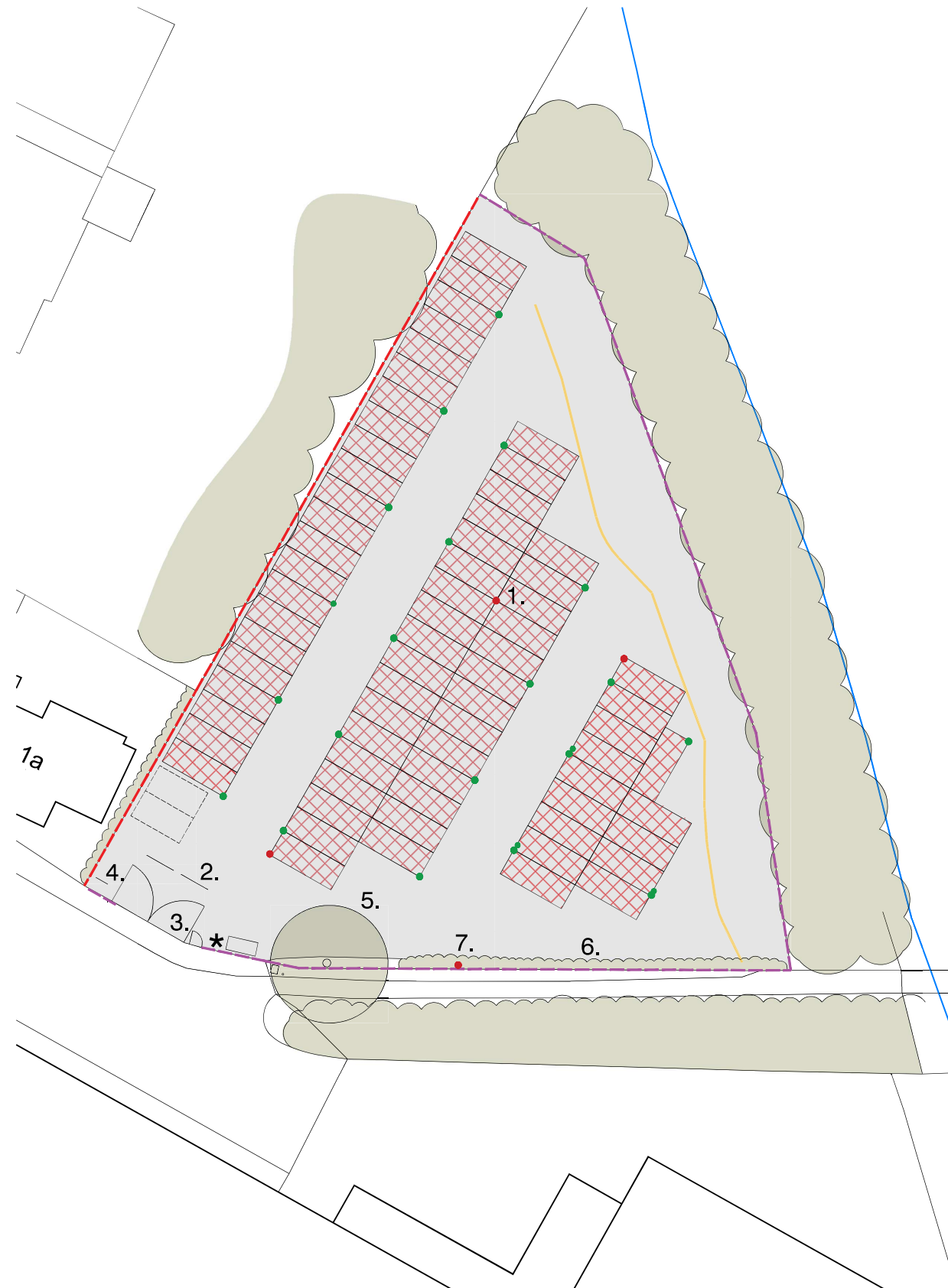


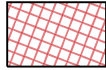
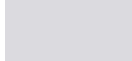
Scale 1:50 @ A3

TIMBER FENCE POSTS AND PANELS



- PLANNING -



- 8m EASEMENT TO RIVERBANK
-  PROPOSED 67 No. STORAGE CONTAINERS (CONTAINERS STOOD ON BLOCK PADS)
- - - EXISTING FENCE RETAINED (2.5m HIGH MESH FENCE ON 2.8m CONCRETE POSTS)
- - - EXISTING FENCE RETAINED (1.9m HIGH MESH FENCE ON 2.2m CONCRETE POSTS)
-  EXISTING TARMAC SURFACE RETAINED
-  2 No PARKING BAYS
- * BIN STORAGE AND COLLECTION POINT
- SECURITY LIGHTING ON PIR (REFER TO DP06)
- CCTV (REFER TO DP06)
- 1. EXISTING CCTV/LIGHTING POST RETAINED
- 2. EXISTING SPEED BUMPS RETAINED
- 3. EXISTING VEHICULAR AND PEDESTRIAN GATES RETAINED (REFER TO DP07)
- 4. EXISTING SIGNAGE RETAINED (REFER TO DP07)
- 5. EXISTING TREE RETAINED (NO GROUNDWORKS PROPOSED - ALL CONTAINERS SIT ON THE EXISTING TARMAC)
- 6. EXISTING SCRUB RETAINED AND ENHANCED
- 7. EXISTING CCTV/LIGHTING POST RETAINED

Proposed Site Plan

0 10 25m

Scale 1:500 @ A3

- PLANNING -