

Mr David Seaton
PCL Planning Ltd
13A Old Park Avenue
Exeter
EX1 3WD

Our ref: DC/2021/122068/03-L01
Your ref: 0440/16/CRB
Date: 30 August 2022

Dear Mr Seaton

**PROPOSED REDEVELOPMENT OF THE SITE FOR USE AS HOLIDAY VILLAGE
FORMER TOTNES CREAMERIES, TOTNES, TQ9 5JP**

Thank you for consulting us with flood modelling outputs and further details of your redevelopment proposals.

Environment Agency position

Any proposals to redevelop this site will need to demonstrate that the flood risk Sequential and Exception Tests can be satisfied. From the information provided it appears that a development can be provided on this site which would be safe from flooding over its lifetime, not increase flood risk elsewhere and provide a betterment to Totnes. You will also need to submit information which demonstrates that the proposal will deliver a net gain in biodiversity and remediate any contaminated land.

Our advice regarding flood risk, following our review of the submitted information, is provided below.

Advice – Flood Risk

The modelling uses the latest 2019 Climate Change allowances. As a result of these climate change allowances, the model outputs indicate that the extent of flooding is worse than previously considered in the ATMOS design. This means that the developable area of the site will be smaller than previously anticipated.

Nevertheless, the revised flood modelling outputs (August 2022) appear to demonstrate that a raised plateau can be created to support new development within the overall site. The proposed plateau appears to be high enough to provide a development which would be safe from flooding. However, to ensure that this land raising does not increase flood risk to adjacent third-party land (inc. part of this overall site and the railway station), it will be necessary to lower approximately 50% of the overall dairy crest site to provide flood compensation. This is a greater amount of land lowering than was previously assessed using the old climate change allowances.

Environment Agency
Sir John Moore House Victoria Square, Bodmin, Cornwall, PL31 1EB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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The proposed raised plateau and leat throttle structure also appear to provide betterment to Totnes by enhancing our built Flood Defence Scheme.

We would be happy to review the full flood modelling results and any subsequent development enquires/planning applications to provide a more detailed comment.

Other matters that need to be considered -

There are also matters relating to biodiversity net gain and remediation of contaminated land which will need to be addressed before the proposal will be acceptable. We can provide further advice on these matters under our cost recovery service upon request.

Review of Documentation and Further Work

We would welcome further pre-application consultation if you would find this helpful. As you are aware, we will charge for our technical advice based on a standard hourly rate that enables us to cover our costs.

We welcome your feedback on our service to date. Please tell us what you think by completing our survey

<https://www.smartsurvey.co.uk/s/PlanningAdviceServiceCustomerSurvey/>

Yours sincerely

SARAH SQUIRE
Sustainable Places - Planning Advisor

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