

FLOOD RISK ASSESSMENT (FRA)

Hunters Moon (The Lodge), Henford's Marsh, Warminster, Wiltshire, BA12 9PA

Class MA prior approval – change of use to a single dwellinghouse (C3)

Prepared by Context Planning Ltd on behalf of Mr Nick Clift | Our ref: 1349 | June 2026

1. Site Location and Description

This Flood Risk Assessment (FRA) is submitted in support of an application for prior approval under Class MA of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use of the building at Hunters Moon (The Lodge), Henford's Marsh, Warminster, BA12 9PA (National Grid Reference ST 87787 43850) from a restaurant (Use Class E(b)) to a single dwellinghouse (Use Class C3).

The building is an existing two-storey detached property of conventional construction, with the former restaurant accommodation at ground floor and residential accommodation at first floor. The proposal involves a change of use with internal alterations only; there is no change to the building footprint, no extension to the building, and no change to site levels or to the existing surface water drainage arrangements.

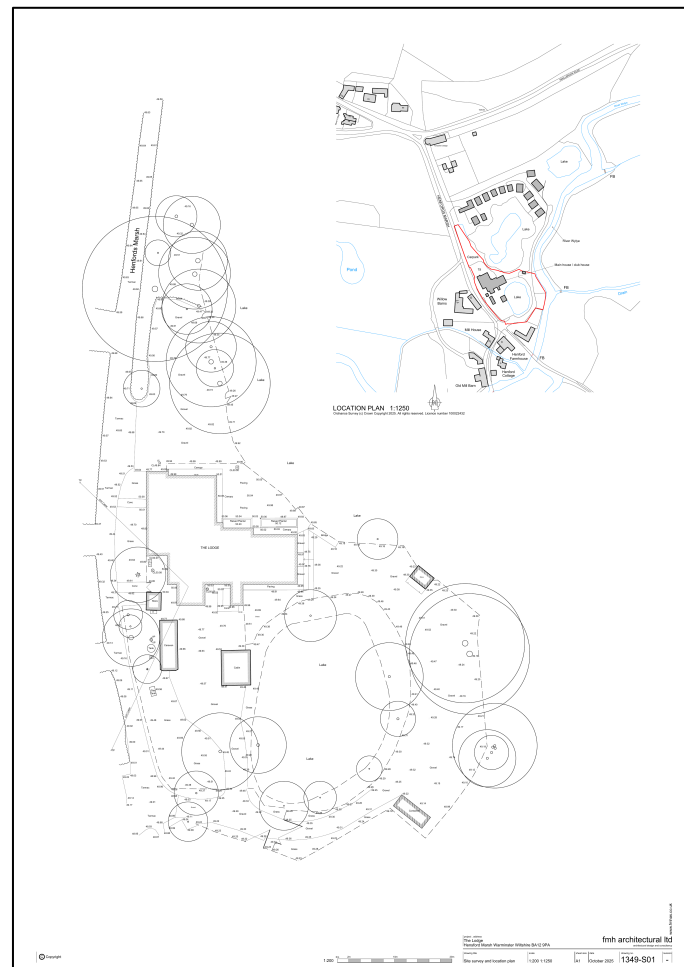
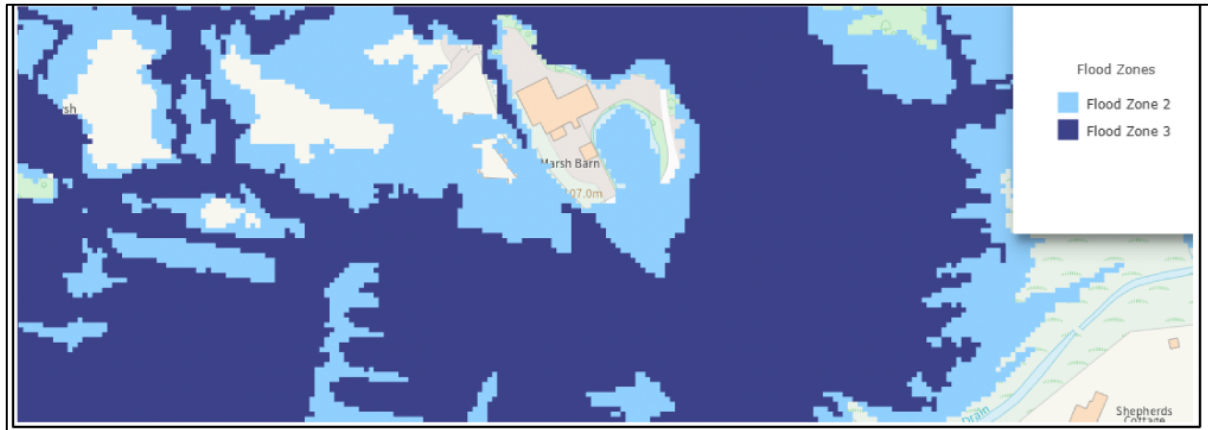


Figure 1 – Site location plan (drawing 1349-S01).

Sources of flood risk and Flood Zone

The Environment Agency Flood Map for Planning shows that the wider site lies within Flood Zones 2 and 3. However, the building itself lies within Flood Zone 1. This is important as Paragraph MA.2(2)(c) requires the developer to apply for a determination as to whether prior approval is required as to: “flooding risks in relation to the building”. The assessment is therefore directed at the building, that is, whether the building itself can be safely occupied as a dwelling and not at the wider site or the principle of locating development in this location.



In addition to fluvial risk, the Wiltshire Strategic Flood Risk Assessment (SFRA) identifies the area as being susceptible to surface water and groundwater flooding. These sources are addressed at Sections 6 and 7 below. The site is not protected by, and does not rely upon, any formal flood defences.

Modelled flood levels and floor levels

The topographic survey accompanying the application (drawing 1349-S01) indicates existing ground levels around the building in the order of 49.9–50.1 m AOD. The ground-floor finished floor level is approximately 50.1 and remains as existing. As set out below, the first floor provides a permanent safe refuge above the design flood level.

2. Vulnerability Classification and the Sequential Tests

Under the flood-risk vulnerability classification in the Planning Practice Guidance (PPG), the existing restaurant use is ‘less vulnerable’, whereas the proposed dwellinghouse is ‘more vulnerable’. However, there is existing residential accommodation on site which is ancillary to the restaurant use. The proposal therefore involves an increase in the vulnerability of the use of the ground floor of the building.

Sequential test

The proposal is a change of use of an existing building, with no operational development. Under the PPG and the Environment Agency's standing advice, the sequential test does not need to be applied to a change of use (other than a change of use to a caravan, camping or chalet site, or to a mobile home or park home site). This is not a use of any of the excepted kinds, and so the sequential test is not engaged. This is also consistent with the building-

focused scope of the Class MA flooding matter, which is directed at flooding risks 'in relation to the building' (paragraph MA.2(2)(c)).

3. Flood Risk Mitigation and Resilience

As the building lies within Flood Zone 1, it is at low risk of fluvial flooding and no mitigation is strictly necessary to make the building safe for its proposed use. Nevertheless, given the wider site's Flood Zone 2/3 context and the surface water and groundwater susceptibility identified in the SFRA, the building offers, and can incorporate, the following additional resilience:

- flood-resistant (water-entry-resistant) measures to ground-floor openings, such as flood barriers/door guards and airbrick covers, appropriate to the design flood level;
- flood-resilient internal finishes and construction at ground-floor level (for example solid floors, water-resistant wall finishes and the use of removable or resilient fittings), enabling rapid clean-up and re-occupation after any event;
- raising of electrical sockets, consumer unit and services above the design flood level; and

These measures are contingency safeguards rather than essential mitigation, and can be secured by condition if the Council considers it appropriate.

4. Flood Warning and Evacuation

The property will be registered with the Environment Agency Flood Warning Service so that the occupiers receive advance warning of flooding. A Flood Emergency and Evacuation Plan (FEED) can be prepared in consultation with the Wiltshire Council emergency planning team and the emergency services, and can be secured by condition. The plan will set out:

- contact details and responsibilities;
- flood warning and monitoring procedures;
- evacuation triggers and routes, and the first-floor refuge arrangements; and
- occupier familiarisation and periodic testing.

Where evacuation is not possible, the permanent first-floor refuge, which sits above the design flood level, provides a safe place until floodwaters recede or assistance arrives. Safe access and egress, and the adequacy of the refuge for overnight occupiers, are matters the FEED will address.

5. Climate Change, Lifetime and Residual Risk

On the basis of the existing storey heights, the first-floor refuge is expected to remain above even the upper-end climate change flood level, such that the building remains safe for its lifetime.

The site is not protected by formal flood defences, so the residual risk associated with breach or overtopping of defences does not arise. Residual risk is limited to a flood exceeding the modelled design event; this is managed through the permanent first-floor refuge, the resilience measures, the flood warning service and the evacuation plan. The change of use does not

increase flood risk to third parties, as there is no change to the building footprint, ground levels or displacement of floodwater.

6. Surface Water and Groundwater Drainage

There is no increase in built footprint or impermeable area, and the existing surface water drainage arrangements are retained. The opportunity will be taken, so far as practicable within an existing developed curtilage, to reduce surface water run-off rates and improve infiltration through sustainable drainage measures, in accordance with Core Policy 67 of the Wiltshire Core Strategy, delivering a betterment over the existing largely hard-surfaced condition. This will include increased landscaping and the inclusion of waterbutts within the site. If necessary, this can be secured via condition.

The Wiltshire SFRA (Level 1, Appendix G – Groundwater Emergence) identifies the area as being susceptible to groundwater flooding. This is, however, strategic, area-based mapping: it identifies broad zones of potential groundwater emergence at a coarse resolution and does not indicate that this particular building has flooded, or will flood, from groundwater.

The proposal is a change of use of an existing building with no operational development. There is no excavation or below-ground construction, no basement or other below-ground accommodation, no change to the building footprint and no alteration to existing floor levels. The change of use therefore neither creates nor increases any exposure to groundwater flooding and cannot increase groundwater flood risk elsewhere. The building is long-established and has operated in its existing form without alteration to its floor levels.

To the extent that any residual groundwater risk arises, it is managed by the same measures relied upon elsewhere in this assessment, resilient ground-floor finishes, raising of electrical services above floor level, the permanent first-floor refuge, and registration with the flood-warning service, which can be secured by condition. The proposal is therefore acceptable in respect of groundwater flood risk.

7. Conclusion

The building lies within Flood Zone 1 but the wider proposed residential curtilage lies within Flood Zones 2 and 3 and is subject to fluvial risk from the River Wylye. Class MA only requires an assessment of the flood risk to the building, not the wider site. The proposal is a change of use of an existing two-storey building to a single dwelling, with no operational development. The proposal re-uses a previously-developed building and contributes to housing supply, and the building can be occupied safely for its lifetime by reason of the permanent first-floor refuge above the design flood level, flood resistance and resilience measures, registration with the flood warning service and an agreed evacuation plan, without increasing flood risk elsewhere.

The proposed development is considered safe and acceptable in flood-risk terms, and accords with the flooding risks prior approval matter under Class MA (MA.2(2)(c)) and with the flood-risk policies of the National Planning Policy Framework and the Planning Practice Guidance.