

06 August 2026

Our Ref: LPC.5894

Mr Andrew Thomas
Wiltshire Council
Planning Services
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Mr Thomas,

FLOOD RISK ASSESSMENT

Planning Application PL/2025/07781

Proposed Glamping Pods (4 No.)

Land at Home Farm. Rood Ashton, West Ashton, Trowbridge, BA14 6BL

I write further to our recent correspondence in relating to the flood risk classification of the site in order to demonstrate the acceptability of the proposed development within the context of planning policy for flood risk.

Planning Policy Context

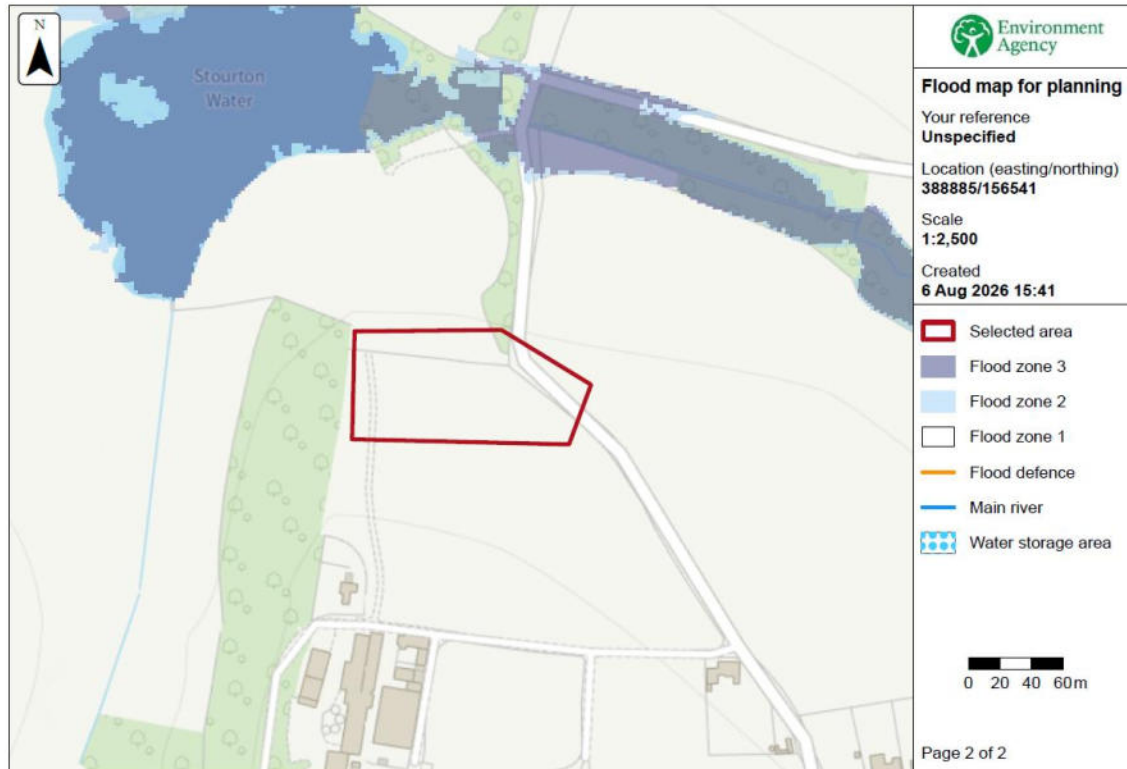
The National Planning Policy Framework (NPPF) requires a sequential risk-based approach to be adopted to individual applications in areas known to be at risk now or in future from any form of flooding (Paragraph 173). However, it goes on to advise that "The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)" (Paragraph 175).

The NPPF text is supplemented within the Planning Practice Guidance (PPG) which advises that "In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied." (Paragraph: 027 Reference ID: 7-027-20220825).

LPC (TRULL) LTD
TRULL, TETBURY
GLOS, GL8 8SQ
Tel: 01285 841433
www.lpctrull.com

Site-Specific Flood Risk Assessment

The Environment Agency's Flood Maps details that the application site falls within Flood Zone 1 and is not a risk from surface water flooding, now or in the future:



The Annex 3 'Flood risk vulnerability classification' that applies to the proposed development is 'More Vulnerable'. The table below confirms that the proposed development is acceptable within Flood Zone 1:

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

While the site falls within Flood Zone 1 it is recognised that the Council's Strategic Flood Risk Assessment identifies the land as being within an area where Groundwater Emergence needs to be considered:



Strategic Flood Risk Assessment – Groundwater Emergence Map

- This zone is deemed as having a negligible risk from groundwater flooding due to the nature of the local geological deposits.
- Flooding from groundwater is not likely.
- There is a risk of flooding to subsurface assets but surface manifestation of groundwater is unlikely.
- Within this zone there is a risk of groundwater flooding to surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.
- Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.

The Strategic Flood Risk Assessment explains that at the application site there is a risk of groundwater flooding to surface and subsurface assets. The worst case scenario therefore is water emerging at the surface, it will not flow overland.

The application site is however an agricultural field which slopes south to north, as shown in the photograph below. There is therefore no possibility of groundwater appearing at the surface without naturally flowing north away from the site towards the lake.

Notwithstanding the above, the proposed glamping pods will be installed on screw piles to ensure they are level and will be elevated above the ground. There will therefore be no risk to the occupiers of the site from the potential of groundwater emerging at the surface. The access to the glamping pods is also at a higher land level so there will always be a convenient and safe access to and from the facility.



Photograph of Application Site

In light of the above, it is considered that due to the topography of the site and the design of the development future occupiers and users of the facility would remain safe from current and future surface water flood risk for the lifetime of the development. Furthermore, the development will not increase the risk of flooding elsewhere, which can be demonstrated via the submission of a detailed drainage scheme via a condition of the planning permission. As such, and in line with the aforementioned NPPF and PPG policy provisions, the sequential test need not be applied.

Notwithstanding the above, it is material to note that due to the extent of the Groundwater Emergence areas identified within the Strategic Flood Risk Assessment there are no other alternative or more favourable locations to re-site the development, and the exception test can also be met i.e. "the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall" (Paragraph: 031 Reference ID: 7-031-20220825).

It is recognised that the Lead Local Flood Authority has no objection to the proposed development and therefore it is respectfully requested that planning permission be granted.

Yours faithfully,

M Jones

Morgan Jones
Associate
LPC (Trull) Ltd

