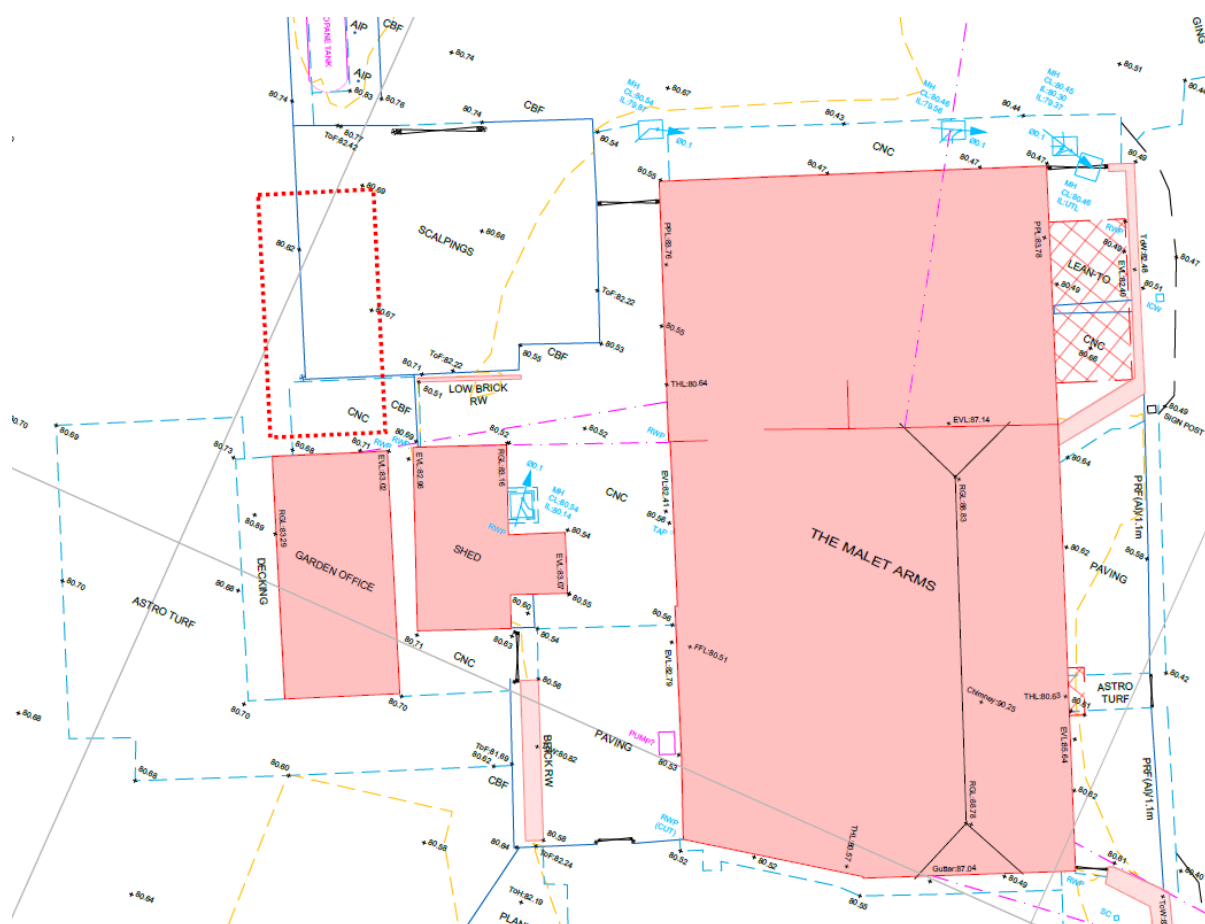


September 2026

- 1.1. This FRA has been prepared to support an application for the erection a single storey outbuilding to house an office space to the rear of the existing public house at the Malet Arms, Newton Tony, SP4 0HF.
- 1.2. The application site is a public house with a garden to its west and a car park to its north. Between the pub and its associated garden sits a small area of hardstanding upon which the outbuilding has been built.



Sources and Assessment of Flood Risk

- 1.3. The site is located entirely within Flood Zone 3. This designates areas at the highest risk of fluvial flooding. Figure 2 shows the extent of Flood Zone 3 around the site.

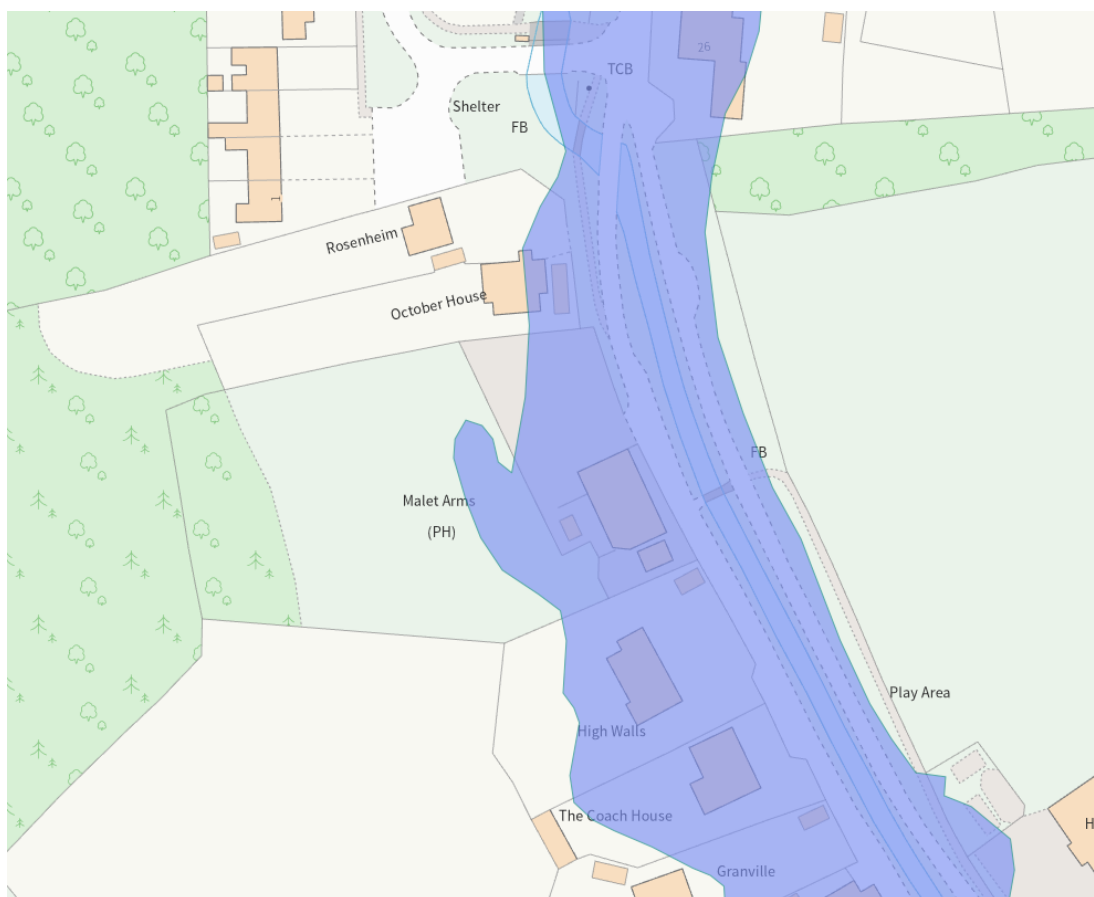


Figure 2: A map showing the extent of Flood Zone 3 around the site. Taken from the Wiltshire Strategic Flood Risk Assessment Data Explorer.

- 1.4. The site is not at risk of surface water flooding, including in a 1 in 1000 year flood event.

Flood Risk Policy

- 1.5. Policy F4 of the NPPF states that *“To inform the assessment of flood risk and, where relevant, appropriate mitigation, a site specific flood risk assessment should accompany all development proposals in Flood Zones 2, 3a, and 3b as defined in Annex F, table 1”* and *“Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6.”*
- 1.6. Policy F5 of the NPPF relates to the sequential test. It sets out that sequential testing is not required for *“Small non-residential extensions (with a footprint of less than 250m²)”*. Whilst the proposal is for an outbuilding, it is an extension of the pub use and it is considered therefore that the sequential test is not required.
- 1.7. Policy F6 states that:

“In areas falling within flood zones 2, 3a, or 3b (as defined in Annex F, table 1):
a. Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3; and

b. In certain other circumstances set out in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an ‘exception test’ is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:

- i. Provide wider sustainability benefits to the community that outweigh the flood risk;*
- ii. Be safe for its anticipated lifetime in accordance with policy F7; and*
- iii. Not increase flood risk elsewhere and, where possible, reduce flood risk overall.*

2. The application of the exception test should be informed by a site-specific flood risk assessment. The exception test does not need to be applied:

a. To those forms of development, or in those circumstances, where the sequential test is not required, as set out in policy F5; or

b. Where development is proposed on a site allocated in the development plan to which the exception test was applied at the plan-making stage, unless there has been a significant increase in the risk of flooding to the site subsequently, or the nature of the development itself has changed significantly from that which was allocated so as to introduce a more vulnerable use (having regard to Annex F, table 2).”

- 1.8. As an office or store use, the development is characterised by Annex F of the NPPF as ‘less vulnerable’. As such, the exception test is also not required.

Table 3: 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	✓ *

Key:

✓ Exception test is not required

X Development should be refused

- 1.9. The proposed office outbuilding is extremely modest in scale at only 18m². It will not bring new workers or a new permanent population to this location, but rather will enable the existing staff at the Malet Arms to carry out their work more effectively. It does not therefore increase the risk of damage or danger from flooding at the site, as the pub itself is already located in flood zone 3 and has been located there for around 300 years.
- 1.10. The development would also not materially increase the risk of flooding elsewhere. As noted above, the extension is extremely modest in size. It is also built on an existing area of hardstanding. Consequently, the erection of the extension will have very little effect on the ability of the wider site to absorb water and will not materially increase the amount of runoff into the watercourse.

Conclusion

- 1.11. The proposed development comprises a small outbuilding to house an office on a public house in Newton Tony, Wiltshire.
- 1.12. The proposed development is located in Flood Zone 3, but is classified as less vulnerable as is therefore able to be built in Flood Zone 3a in principle.
- 1.13. It is exempt from the requirement to carry out and pass a sequential test and an exception test.
- 1.14. It will not materially increase the risk of damage or danger from flooding, either at the site or elsewhere.
- 1.15. Given the above, the proposal complies with national policy found in the NPPF and associated planning guidance and its flood risk impact is acceptable in planning terms.