

3-5 New Street, Salisbury SP1 2PH
Planning Application for Material Change of Use

Site-specific Flood Risk Assessment

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Introduction

This assessment is made following consultation with the Environment Agency and incorporates the requirements of the Environment Agency Guidance on Flood Risk and Coastal Change and the Checklist for Site-specific Flood Risk Assessment. A copy of the latter is attached for ease of reference.

1. Pre-application Advice

This application is made following the provision of pre-application advice Reference: ENQ/2021/04661 (the “Advice”). The application was for advice on a proposal to split the property and extend beyond the existing building footprint at the ground floor rear of the main building. The application was refused because of the alterations to the front and rear elevations of the property.

A copy of the Advice is attached for ease of reference.

The Advice is still relevant because the planning officer considered the position of an application without alterations, as follows. The summary of the Advice received was as follows:

Summary of Officer View

‘The proposal is considered to be unacceptable as it would be in conflict with the policies of the development plan (creation of additional dwellings including extensions within Flood Zone 2).

'This response explains the reasons why the proposals are considered to be unacceptable in principle. Submission of an application as proposed in the pre-application is not recommended.

'For the proposals to be considered acceptable in principle, they would need to be amended to be change of use with only internal and external alterations to appearance without extensions.'

The Advice contained the following comments specific to Flood Risk applicable to this current proposal as amended following the pre-planning advice:

Flood Risk Assessment were the scheme revised to change of use only:

'Were it possible to convert the property without extensions (only including alterations to the external appearance), then a sequential test would not be required (emphasis added) although a site-specific FRA would be required in accordance with paragraph 168 of the NPPF:

'168. Applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote.

'For example, I note the pre-application refers to the 1854 extension being able to be converted without alterations, in which case were this element submitted as a stand-alone scheme then a sequential test would not be required, and a site-specific FRA would be.

The example given by the Planning officer is exactly what is now being applied for, i.e. that the 1854 extension is split off as a stand-alone scheme without alterations to any part of the two properties thus formed. Nor, in fact, are there any alterations to the external appearance. Therefore, according to the planning officer the sequential test is not required in the case of this application.

Paragraph 168 of the National Planning Policy Framework is now numbered 176 in the 2024 version, but appears unchanged, as follows:

Paragraph 176

Applications for some minor development and changes of use (emphasis added) [62] should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.

[62] This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park

It appears, therefore, that the advice given by the planning officer still applies, so that a sequential test is not required, although a site-specific FRA is.

Following the pre-planning advice, this application is amended so that there are no extensions, or indeed any alterations whatsoever. Accordingly, no sequential test has been undertaken because the Advice states that it would not be required.

Further, this was confirmed in pre-planning advice given in an email from Wiltshire Development Management dated 12th January 2026, copy attached, which states:

'The current NPPF (Dec 2024) confirms a proportionate approach to flood risk. Paragraph 175 makes clear that the sequential test is not required where a site-specific Flood Risk Assessment (FRA) demonstrates no built development or access/egress would be located in an area at risk from any source of flooding, now or in the future. For a change of use only, you should still provide a site-specific FRA using the latest EA data. Your note that the site is above EA 2D modelled flood levels and enclosed by 2m walls is helpful. Please ensure the FRA references current EA flood mapping and climate allowances and sets out safe access/egress arrangements (even though no works are proposed)'

The Site-specific Flood Risk Assessment shows the site to be at no risk of flooding from any source now or in the future, so fulfilling the requirements of paragraph 175, confirming that the sequential test is unnecessary

2.Consultation with the Environment Agency

The applicant has sought advice and information from the EA and a copy of the correspondence dated 6 February 2026 is attached.

The following Flood Risk Assessment follows that advice and incorporates the information contained both in it and in the sources identified by the EA. To ensure it is comprehensive, the Flood Risk Assessment follows the format of the Site-specific Flood Risk Assessment Checklist, copy attached.

3. Development site and location

A location map is attached to the planning application which clearly indicates the development site.

- a. The postal address is provided above. The national grid reference is identified by the Environment Agency as SU1450829782
- b. The current use of the site is residential
- c. The site is within Flood Zone 2
- d. The Wiltshire Council Strategic Flood Risk Assessment does not identify any other sources of flooding other than rivers that might affect the site now or in the future.

4. Development proposals

a. The development proposal made in respect of 3-5 New Street, Salisbury, SP1 2PH is for the division of the existing dwelling into two separate dwellings as already physically existing, without any alterations or extensions.

b. Annex 3 to the National Planning Policy Framework covers Flood risk vulnerability classification. The Annex sets out five classifications of vulnerability: Essential infrastructure, Highly vulnerable, More vulnerable, Less vulnerable and Water-compatible development.

Residential dwellings are in the More vulnerable category

c. The expected lifetime of the proposed development is 100 years, the property already having survived over 200 years without any record of flooding.

5. Why the Sequential Test is Not Required

As stated in section 1 above, the pre-planning Advice received both in 2022 and 2026 states that no sequential test is required, by reference to the National Planning Policy Framework.

In any event, this Flood Risk Assessment demonstrates below that there is no flood risk to the building. This is because it is above the highest of the Environment Agency 2D Modelled Flood Water Plain Water Levels, i.e. above the 0.1% Annual Exceedance Probability (AEP) (1000yr) defended level.

6. Climate Change

The EA 2D Modelled Flood Water Plain Water Levels figures provided for the site effectively allow for climate change by the introduction of increase in flow figures of 30%, 40% and 85% which is the range referred to in the Wiltshire Council Strategic Flood Risk Assessment (SFRA).

Accordingly, in the following section this Flood Risk Assessment accounts for the relevant EA Annual Exceedance Probability (AEP) figures in assessing the site-specific risk.

7. Site specific flood risk

Site-specific flood information for 3-5 New Street provided by the Environment Agency on 6 February 2026 is attached, together with information obtained from the sources identified by the EA.

The EA 2D Modelled Flood Water Plain Water Levels shown in the EA information are as follows:

Undefended Levels

1% AEP (100yr) undefended:	0.00 mAOD
1% AEP (100yr) with 30% increase in flow - undefended:	45.95 mAOD
1% AEP (100yr) with 40% increase in flow - undefended:	45.97 mAOD
1% AEP (100yr) with 85% increase in flow - undefended:	46.10 mAOD
0.1% AEP (1000yr) undefended:	46.10 mAOD

Defended Levels

1% AEP (100yr) defended:	0.00 mAOD
1% AEP (100yr) with 30% increase in flow - defended:	45.95 mAOD
1% AEP (100yr) with 40% increase in flow - defended:	45.97 mAOD
1% AEP (100yr) with 85% increase in flow - defended:	46.10 mAOD
0.1% AEP (1000yr) defended:	46.14 mAOD

As is apparent from the tables, the maximum flood level of a 1% AEP within a 100-year period is 46.10 metres above ordnance datum (mAOD), for both undefended and defended levels. This increases by 0.04 metres (4 centimetres) for the 0.1% AEP 1000-year defended model.

The depth of flood likely to be experienced at the site in respect of any modelled level is determined by the difference in height between the modelled flood level and the height of the site.

The site is located on land rising both South to North and East to West from the junction of New Street and St John's Street. A topographical survey has been undertaken solely to determine the level of the entrances to the building by reference to the Ordnance Survey benchmarks located on the White Hart at the corner of St John's Street and Ivy Street and on College Chambers in New Street. This survey provides the following data:

White Hart Benchmark	46.427 mAOD
Adjusted to ground level	45.927 mAOD
College Chambers Benchmark	46.665 mAOD
Adjusted to ground level	46.265 mAOD
Ground level outside New Street door to Dwelling 2 (left-hand door)	46.15 mAOD
Level of entrance to Dwelling 2	46.19 mAOD
Ground level outside New Street door to Dwelling 1 (Main entrance)	46.182 mAOD
Level of entrance to Dwelling 1	46.282 mAOD

Site-specific Levels of Pavement Higher than any EA 2D Modelled Flood Water Plain Water Levels

Therefore, although the site lies within Flood Zone 2, as is apparent from the survey, the height at pavement level outside each front door exceeds all of the EA modelled flood levels, so the site is above these levels.

Additionally, the actual entrance levels are above pavement height and so further exceed the modelled levels.

This means the site is not expected by the EA to flood within any of its modelled flood levels for 1 in 100 and 1 in 1000 years.

The heights by which the entrance heights exceed the modelled flood levels are:

Height of entrances above Modelled Flood Undefended Levels

	Dwelling 1	Dwelling 2
1% AEP (100yr) undefended:	46.19 m	46.282 m
1% AEP (100yr) with 30% increase in flow - undefended:	0.24 m	0.332 m

1% AEP (100yr) with 40% increase in flow - undefended:	0.22 m	0.312 m
1% AEP (100yr) with 85% increase in flow - undefended:	0.09 m	0.182 m
0.1% AEP (1000yr) undefended:	0.09 m	0.182 m

Height of entrances above Modelled Flood Defended Levels

	Dwelling 1	Dwelling 2
1% AEP (100yr) defended:	46.19 m	46.282 m
1% AEP (100yr) with 30% increase in flow - defended:	0.24 m	0.332 m
1% AEP (100yr) with 40% increase in flow - defended:	0.22 m	0.312 m
1% AEP (100yr) with 85% increase in flow - defended:	0.09 m	0.182 m
0.1% AEP (1000yr) defended:	0.05 m	0.142 m

Site-specific Levels of Entrances Higher than any EA 2D Modelled Flood Water Plain Water Levels

The figures in the table show that the building is not at risk of flooding within any of the EA assessment parameters for 1 in 100 and 1 in 1000 years because all entrances are higher than the modelled flood levels.

Garden Enclosed

In regard to the garden at the rear of the building, this slopes upward from the rear of the property, so increases in height. It can be seen on the flood map for planning that the majority of the garden is not within any Flood Zone.

It is also fully enclosed on all sides by solid brick or stone walls of no less than six feet in height. This forms an existing solid flood barrier preventing flooding to the rear of both dwellings and is unchanged by the proposed division of the property and the garden.

The Environment Agency's Flood Maps for Planning are attached. These show the following, which are not accurately site-specific but general to the location:

Site in Flood Zone 2 - Site at Low risk

Surface water extent of flooding – Site at no risk for 1 in 30 and 1 in 100 years periods

Reservoirs – Site outside area of risk

Historic Flood Map – No history of flooding

These low levels of risk are confirmed by the GOV.UK information for long term flood risk, copy attached, which shows the risks of flooding is low both from surface water and rivers and sea.

Neither the EA's historical flood map nor the SFRA record any historic flooding at the site.

Conclusion

Taking all the foregoing information into account, there is no reason to expect that there will be any flooding of the site within the 100-year predicted lifespan of the proposal.

Because the proposal involves no physical changes there is no possibility of causing any increase in flood risk off-site and elsewhere.

8. Surface water management

No alterations are proposed to existing arrangements for surface water management, which have always proved satisfactory.

9. Occupants and users of the development

The development proposal has no effect on the overall number of potential occupants, which is effectively determined by the number of bedrooms. This is unchanged by the proposal. The current building has a total of nine bedrooms and this number remains unchanged.

Nothing in the proposal changes the nature or times of occupation or use, which remains residential and has no reason to affect the degree of flood risk.

There are no changes in the proposal that could make occupants and users more vulnerable to the impact of flooding.

10. Safe Access/Egress Arrangements

Because the pavement outside the properties is at a level above the maximum EA 2D Modelled Flood Water Plain Water Levels (1000year), the pavement would remain dry during any flood and so provide safe access/egress at all times.

11. Why the Exception Test is Not Required

The Checklist for Site-specific flood risk assessment refers to paragraph 163 of the National Planning Policy Framework:

163. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

Flood Zones	Flood Risk Vulnerability Classification Essential infrastructure				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water-compatible development
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 not be permitted				

Table 1

As can be seen from Table 1 the Exception test is not required for residential dwelling planning applications in Flood Zone 2.

In regard to points a – c of this section of the Checklist for Site-specific flood risk assessment:

- a. The site will be unchanged, so the effect of the proposal on the flood risk to and from the proposed development is neutral,
- b. The site will be unchanged, so cannot increase flood risk elsewhere,
- c. The site will be unchanged, so is unlikely to reduce flood risk overall.

12. Residual risk

In the absence of a requirement for any mitigation measures because of the absence of any actual site-specific flood risk there are no residual risks to account for that the applicant can affect.

13. Flood risk assessment credentials

This flood risk assessment has been undertaken by the applicant, Raymond Wicks, who has the following relevant qualification of FRICS – Fellow of the Royal Institution of Chartered Surveyors. The flood risk assessment was completed in February 2026.

Summary

This site-specific assessment demonstrates that the property stands above all of the EA 2D Modelled Flood Water Plain Water Levels and so is not at risk of flooding.

Attachments

- Checklist for Site-specific Flood Risk Assessment
- Copy of correspondence with the Environment Agency

- Flood information from sources identified by the Environment Agency, including EA Flood Maps for Planning and GOV.UK information for long term flood risk.