

DELEGATED REPORT

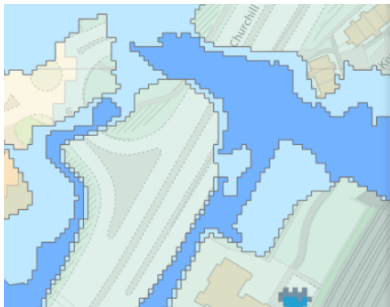
Application Reference:	PL/2025/09994
Application Type:	Full planning permission
Site Address:	DUNNS HOUSE, ST PAULS ROAD, SALISBURY, SP2 7BE
Proposal:	External alterations for the provision of an external access route from the first floor (via new door and ramp) to external ground level to the rear of the building
Recommendation:	Approve subject to Conditions

SITE DESCRIPTION/CONTEXT

The site comprises the upper floors of an existing 5-storey office building situated within the defined settlement boundary of Salisbury, which is designated as a Principal Settlement in Wiltshire Core Strategy (WCS) policies CP1 (Settlement Strategy), CP2 (Delivery Strategy) and CP20 (Salisbury Community Area). The site is located adjacent to the A36 dual carriageway at one of the entrances to the Central Car Park. The main city centre retail area is within about 10 minutes' walk along the Millstream that borders to the Central Car Park. Waitrose is on the opposite side of the A36 and is about 5 minutes' walk. The property comprises a former grain store which was converted to offices in the early 2000s and refurbished in 2017. The accommodation is arranged over ground and four upper floors with a central service core containing two lifts, stairs and toilet facilities. As part of the 2017 refurbishment, the ground floor was extended to take in what was formerly undercroft parking. Externally there is a parking area to the front of the building for circa 12 vehicles.



Context plan



FZ 2 and 3a

- ☒ Strategic Flood Risk Assessment 2024
- ☐ Appendix B - Community Partnership Areas
- ☒ Appendix C - Flood Map for Planning
- ☒ Flood Zone 3a
- ☒ Flood Zone 2
- ☐ Appendix D - Flood Zone 3b

The building is unlisted and lies outside the Conservation Area. Residential properties at Kivel Court and Valentine Court lie to the north and south respectively and the railway line lies to the east. The site is within the New Forest Protected Sites 13.8km Recreation zone of influence and the River Avon Hampshire SAC catchment.

With reference to the 2024 SFRA, the site lies within Flood Zone 2 and 3 and this means that the site of Dunns House has a high probability of fluvial flooding (greater than a 1 in 100yr annual probability of fluvial flooding).

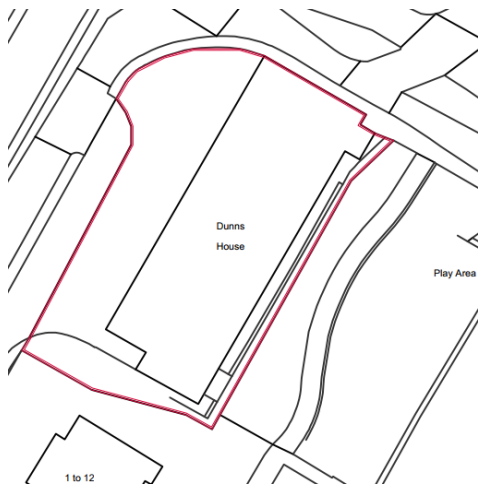
PROPOSAL

Prior Approval was granted under PL/2024/11498 for the change of use of the upper floors to change from Class E space to form 44no. residential apartments. The application was submitted with a flood risk assessment and prior approval was granted subject to conditions including Condition 5:

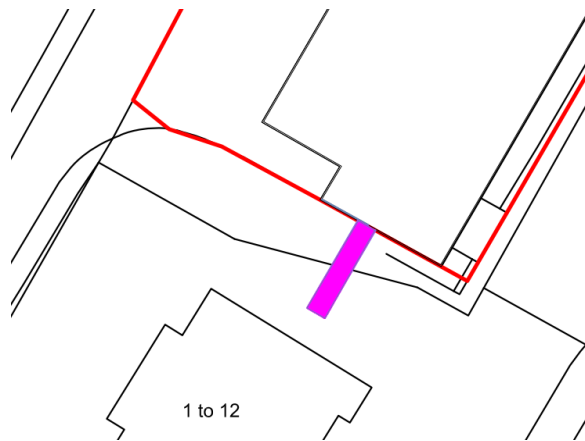
5. The change of use of the upper floors to C3 residential use hereby approved shall not commence until the recommendations contained in the Management of Flood Risk Section 6 of the Flood Risk Assessment by Innervision Design Ltd Dated October 2025 have been implemented in full on the site, following submission of any necessary planning application/s in that behalf. Evidence of the implementation of the measures shall be submitted to and agreed in writing by the Local Planning Authority before the C3 use commences. The agreed measures shall remain in situ for the lifetime of the residential development.

Reason: To ensure safe access and egress to the building for residential occupiers during times of flooding, as the site lies within Flood Zone 3.

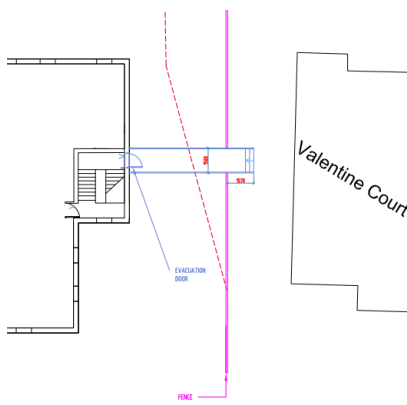
This application seeks planning permission for a new doorway at first floor level and provision of an elevated walkway to create an external access route from the first floor to external ground level to the side of the building, and beyond the flood zone. The ramp would “land” on a grassed area adjacent to the Valentine’s Court building as shown in the photo below. Notice has been served on the adjacent landowners, a consultation letter sent and Certificate B completed on the application form. No third party responses were received.



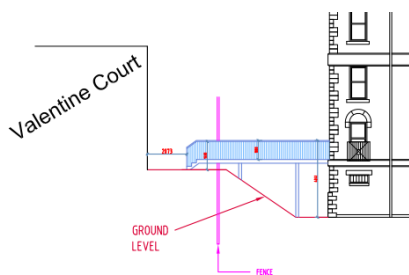
Site Location Plan



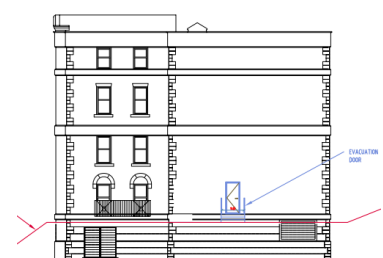
Proposed block plan



Proposed plan



Proposed elevations



Proposed Right - Side Elevation



RELEVANT PLANNING HISTORY:

S/79/0400	Deemed application - Change of use from ware housing class X to light industrial class II Approved
S/1998/1194	FROM OFFICE/LIGHT INDUSTRY TO 50 BED APARTHOTEL AND FOOTPATH CYCLE WAY LINKING WITH TOWN CENTRE Approved with conditions
S/1999/1667	ALTERATIONS TO BUILDING AND CHANGE OF USE FROM OFFICE/LIGHT INDUSTRY TO 32 RESIDENTIAL FLATS (24NO 3 BED UNITS, 8NO 2 BED UNITS) TOGETHER WITH PARKING FOOTPATH AND CYCLE WAY LINKING WITH CITY CENTRE Refused
S/2001/1025	ELEVATIONAL ALTERATIONS INCLUDING FENESTRATION OF EXISTING BUILDING AND ALTERATIONS TO EXISTING ACCESS FOR EXISTING OFFICE (B1) Approved with conditions
S/2000/0777	ALTERATIONS TO BUILDING AND CHANGE OF USE FROM OFFICE/LIGHT INDUSTRY TO 34 RESIDENTIAL FLATS INCORPORATING LEISURE FACILITIES TOGETHER WITH PARKING FOOTPATH AND CYCLE WAY LINKING WITH CITY CENTRE Refuse
PL/2024/11498	Prior Approval Part 3, Class MA: Commercial, business and service uses to dwellinghouses. Schedule 2 Part 3, Class MA for change of use of Class E space to form 44no. apartments. Prior Approval approved subject to conditions:
	6. <i>The change of use of the upper floors to C3 residential use hereby approved shall not commence until the recommendations contained in the Management of Flood Risk Section 6 of the Flood Risk Assessment by Innervision Design Ltd Dated October 2025 have been implemented in full on the</i>

	<i>site, following submission of any necessary planning application/s in that behalf. Evidence of the implementation of the measures shall be submitted to and agreed in writing by the Local Planning Authority before the C3 use commences. The agreed measures shall remain in situ for the lifetime of the residential development.</i> <i>Reason: To ensure safe access and egress to the building for residential occupiers during times of flooding, as the site lies within Flood Zone 3.</i>
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POLICIES:

National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

Wiltshire Core Strategy 2015

CP1 and CP2: Settlement and Delivery Strategy

CP57: Ensuring High Quality Design and Place Shaping

CP67: Flood Risk

Other:

2024 Strategic Flood Risk Assessment

Wiltshire Design Guide

MAIN PLANNING ISSUES

1. Scale, design and impact on flood risk
2. Neighbouring amenity

CONSULTATIONS

Drainage – no objection

Environment Agency – no comment

Salisbury City Council – no comment

REPRESENTATIONS: None received

ASSESSMENT

1. **Scale, design and impact on flood risk**

Flood Risk

In approving the Class MA for the change of use, the LPA considered the flooding risks in relation to the building. At that time, the Environment Agency were consulted and they concluded:

*Provided that the proposed development is connected to the mains foul sewer network. We have **no objection** to the prior approval but have the following comments to make.*

*According to the following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to **safe access egress**. Where necessary, the **advice of relevant experts should be sought** in that regard. Please note that according to*

the Strategic Flood Risk Assessment 2024 the road to the north is highlighted as Flood Zone 3b and the road to the west as Flood Zone 3.

The Council's drainage team as Lead Local Flooding Authority considered the submitted Flood Risk Assessment at the time and concluded:

The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

The site is situated in Flood Zone 2 and FZ 3 surrounds the building. The proposals under the Class MA were only for the change of use of the building and therefore, the sequential test set out in the NPPF could not be applied to changes of use.

However, a Site Specific Flood Risk Assessment was required and was submitted by the applicant. The Given that the building is changing from commercial to residential use, the SSFRA recommended provision of an elevated walkway to provide a safe means of escape during any future flood event within FZ3. The Drainage team concluded:

The application has been supported with a Site-Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.

- It is noted the development is situated in Flood Zone 3.*
- A new emergency walkway is proposed at first floor level to provide safe access and egress during a flood event.*
- A flood evacuation plan will be developed & maintained over the lifetime of the development.*
- At a later stage in the application, the applicant will be required to provide a detailed flood evacuation plan to demonstrate safe access and egress for residents and emergency services remains during a flood event.*

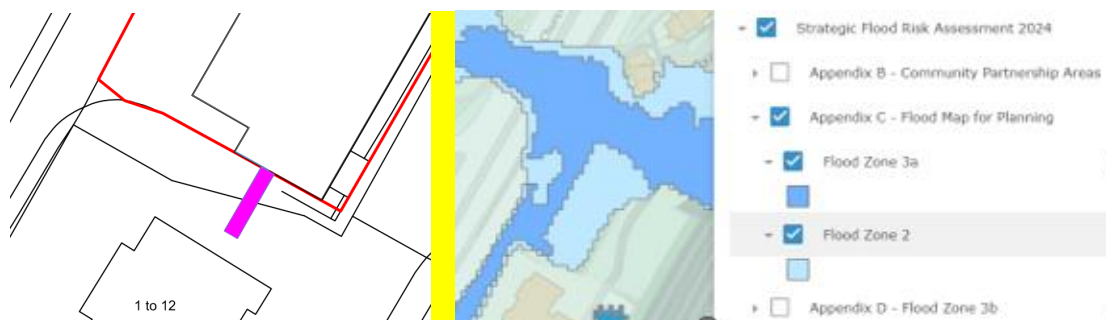


Figure 7: Provision of new Access and Egress route. A new elevated walkway is proposed for emergency use during a flood event.

RECOMMENDATION: *no objection subject to condition:*

No Objection for the following reasons: at this stage of the application, the LLFA believe there is no fundamental reason why this development cannot be proposed as there is no increased flood risk as a result of the development. At a more detailed stage of the application, the applicant will be required to provide further details related to the flood evacuation plan. Detailed dimensions and levels of the elevated walkway will be required to demonstrate that safe access & egress will be maintained during a flood event.

A “new elevated walkway” is proposed under this application to comply with the SSFRA, and it lies partly outside the red line. The walkway is required to enable the LPA to positively conclude that residential occupiers of the building would have safe access out of and into the building during times of flood risk in FZ3. A revised and updated SSFRA has been submitted for the walkway. It is noted that the development spans FZ3, but the ramp itself touches the ground in FZ1, beyond the high risk zones:



As the ramp physically touches the ground in FZ1, the sequential test is not required for the operational Development.

The drainage team commented as LLFA:

The proposal involves only the installation of an elevated emergency escape walkway with no changes to land levels, impermeable areas, or the existing surface-water system. The applicant has now provided further details of the structure through this application, which shows a 7.5 m elevated bridge section extending from the first-floor escape door to the site boundary.

Although the building lies within Flood Zone 3, this walkway delivers the required safe-egress provision and does so without altering the site's drainage characteristics or affecting surface-water pathways. The proposed elevated walkway will not increase flood risk and does not affect land levels, impermeable areas, or the existing surface-water system. As such, we have no objections to this application.

The proposal would comply with the aims of CP67 and ensure the safety of future residential occupiers of the development in the event of flooding.

Design

CP57 considers the impact of development in terms of amenity and design. The proposal involves the formation of an external access route from the first floor to external ground level to the rear of the building. This external access route requires a short “bridge section” from the side door to the site boundary. The works are minor in nature effectively creating a short bridge form the door at first floor level in the side (western elevation) to reach ground level to the west. The new “bridge section” would be protected by railings on either side:



The building is prominent within its urban setting with the railway to one side and the elevated outer ring road on the other and whilst this small section of bridge could be viewed from public vantage points, such views would be minimal, and would not adversely impact the overall design of the building or the character of the wider area.

The scale of the ramp is appropriate to the function that it needs to perform in an elevated position. The visual impact of the development on the elevations and appearance of the building is limited and subject to appropriate materials, the proposals would have an acceptable impact upon the host building and limited impact on the wider area. The proposal would comply with the aims of CP57.

2. Neighbouring Amenity

CP57 also seeks to ensure that appropriate levels of amenity are achievable within the development. The ramp would leave the Dunns House site on adjacent land, and Certificate B has been completed with notice served on the owners. No objections were received.



The “bridge section” proposed to the side elevation whilst at first floor would be at ground floor for the residents of Valentines Court. The ramp and new doorway would face towards the blank side elevation of Valentine’s Court. The proposals would have no material adverse impacts upon the residents of Valentines Court as a result of loss of privacy, loss of daylight/sunlight or potential overlooking and the ramp would be conditioned for “flooding emergency” egress only. No amenity objections are raised under CP57.

CONCLUSION:

The proposed development is considered to comply with Condition 5 imposed on the change of use application for Dunn’s House under PL/2024/11498. The development would comply with the provisions and recommendations of the submitted Site Specific Flood Risk Assessment. There are no design and amenity objections to the development and the balance weighs in favour of approving the scheme.

RECOMMENDATION: APPROVE

Subject to conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Location Plan ref DHS.LP dated 6th Oct 2025

Proposed Block Plan ref DHS.01.PR.SP dated Dec 2025

Proposed First Floor Plan & Front Elevation ref DHS.01.PR.201 dated Sept 2025

Proposed Ground Floor Plan ref DHS.01.EX.200 dated Sept 2025

Proposed Rear and Side Elevations ref DHS.01.PR.202 dated Sept 2025

Planning, Design and Access Statement by Allen Planning Ltd dated Dec 2025

Flood Risk Assessment by Innervision Design Ltd dated Jan 2026

REASON: For the avoidance of doubt and in the interests of proper planning.

3. Before the installation of the ramp and railings take place, the materials, colours and finishes for the scheme shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and maintained in that condition for the lifetime of the development.

Reason: In the interests of the visual appearance of the development.

4. There shall be no residential occupation of the building until the recommendations contained in the Management of Flood Risk Section 6 of the Flood Risk Assessment by Innervision Design Ltd Dated October 2025 have been implemented in full on the site and the ramp and doorway hereby approved have been implemented and completed for use. The measures shall remain in situ for the lifetime of the residential development.

The doorway and ramp access hereby approved shall be used only used as an emergency access/exit as required during times of flooding and not as a normal daily means of access and egress to the building.

Reason: To ensure safe access and egress to the building for residential occupiers during times of flooding, as the site lies within Flood Zone 3.

INFORMATIVE

BNG: The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for development of land in England is deemed to have been granted subject to the condition (biodiversity gain condition) that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan, if one is required in respect of this permission would be Wiltshire Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed below.

Based on the information available this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements in the list below is/are considered to apply:

Development is below the de minimis threshold, meaning development which:

- (i) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- (ii) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).