

3 New Street, Salisbury SP1 2PH

Householder Application for Planning Permission for Alteration and Extension

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.

1. Recent Planning Permission

Planning permission has recently been granted in relation to No 3 New Street, recognising at a separate dwelling and no longer part of Albany House, 3-5 New street.

The Approval is dated 15 June 2026. The application included a full Site-specific Flood Risk Assessment which showed that the site is at no risk of flooding when measured against all of the Environment Agency 2D Modelled Flood Water Plain Water Levels.

This information is provided again in this document.

2. 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.

3. Development proposals

- a. The development proposal made in respect of 3 New Street, Salisbury, SP1 2PH is for the partial demolition of the existing 1964 extension and its replacement to create a two-storey extension that will produce a better proportioned and more useable house which makes the most of what is a narrow building.
- 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.

4. Why the Sequential Test is Not Required

Reason 1

Paragraph 175 of the National Planning Policy Framework was amended on 17 September 2025. The latest Government Guidance on the National Planning Policy Framework in regard to Paragraph 175 states the following at Paragraph 027, Reference ID 7-027-20220825, Revision dated 17 09 2025:

'How should the sequential test be applied to planning applications?

'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.'

It is clear from this guidance that the sequential test need not be applied to this site. The site-specific flood risk assessment demonstrates clearly that there is no flood risk whatsoever 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, as demonstrated later below. The occupiers and users would, therefore, remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere.

This change in emphasis has been confirmed by the judgment of the High Court in *Gladman Developments Ltd v Secretary of State for Housing Communities and Local Government and Lancaster City Council* [2026-EWHC-51-Admin].

In this case the court's central finding was that the inspector had erred in law by treating the absence of a sequential test as an automatic reason for refusal, rather than weighing it alongside other material planning considerations, most particularly that the Site-specific Flood Risk Assessment showed there to be no identified substantive flood harm to the development as proposed. This distinction is critical and applies to this application, which identifies that the site is at no risk of flooding.

Reason 2

Additionally, the Government Guidance states at Paragraph 027a, Reference ID 7-027a-20220825, Revision dated 17 09 2025:

'How should the area of search for the sequential test be identified?

'A pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.'

This requirement for a pragmatic approach recognises the logic that there are situations where an extension to existing premises cannot be accommodated at another location. It is clearly an approach that applies to this application. The extension is relatively small and being an extension to an existing house cannot be located elsewhere.

5. 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.

6. Site specific flood risk

The site-specific flood information for 3-5 New Street provided by the Environment Agency in regard to the recent planning consent 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 was undertaken for the previous application acknowledging the status of No 3 as a separate dwelling and is repeated here. Its purpose was 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

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 level is 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 entrance above Modelled Flood Undefined Levels

	Dwelling 1
1% AEP (100yr) undefended:	46.19 m
1% AEP (100yr) with 30% increase in flow - undefended:	0.24 m
1% AEP (100yr) with 40% increase in flow - undefended:	0.22 m
1% AEP (100yr) with 85% increase in flow - undefended:	0.09 m
0.1% AEP (1000yr) undefended:	0.09 m

Height of entrance above Modelled Flood Defended Levels

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

Site-specific Levels of Entrance 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 the entrance is higher than the modelled flood levels.

Garden Fully 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 garden resulting from the recent permission.

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.

The proposal involves an increase in the site area of the building of 17.2 m², but this is wholly contained within the fully enclosed garden, so there is no possibility of causing any increase in flood risk off-site and elsewhere.

7. Surface water management

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

8. 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 two 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.

9. Safe Access/Egress Arrangements

Because the pavement outside the property 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.

10. 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.

11. 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.

12. Flood risk assessment credentials

This flood risk assessment has been undertaken by 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

- 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.