

Wiltshire Council - Development Control  
South  
SALISBURY, SP2 2HX

Reference: PA-0011590/01  
Customer reference: PL/2026/04841  
22 September 2026

**Renovate store building, convert to 2 x two bedroom dwellings. Re-submission of lapsed permission PL/2022/00705**

**Rear of 44 Winchester Street, Salisbury**

Dear Ms Hayley Clark,

Thank you for consulting us on the above application.

### **Environment Agency Position**

We object to the above proposal due to insufficient information to demonstrate that the development will be safe for its lifetime, without increasing flood risk elsewhere, in accordance with the National Planning Policy Framework (NPPF).

### **Reasons for refusal.**

- The application site is located within Flood Zone 3.
- The submitted Flood Risk Assessment (FRA) does not provide site-specific flood levels, design flood levels, existing or proposed floor levels, flood depths, or climate change flood levels.
- Whilst the FRA states that floor levels will be set above the 1% annual exceedance probability (1 in 100 year) flood level, no supporting survey, level or modelling information has been provided to substantiate this conclusion.
- The FRA does not demonstrate the relationship between the proposed development and the future design flood level, taking account of climate change.
- The FRA does not assess whether flood mitigation measures are required to make the development safe for its lifetime.
- Insufficient information has been submitted to demonstrate that the development will be safe for its lifetime, taking account of flood risk and climate change.

We acknowledge that the proposal comprises the conversion and regeneration of an existing building and may constitute a minor development and/or change of use. As such, a proportionate approach to flood risk assessment may be appropriate.

However, the NPPF and associated Planning Practice Guidance requires development in areas at risk of flooding to be supported by a site-specific Flood Risk Assessment demonstrating that the development will be safe for its lifetime without increasing flood risk elsewhere. Whilst the level of assessment may be proportionate to the scale and nature of the proposal, sufficient information must nevertheless be provided to demonstrate compliance with these policy requirements.

The submitted FRA identifies that the site lies within Flood Zone 3 and is at risk of fluvial flooding. However, the assessment relies largely upon Flood Zone mapping and general statements regarding flood risk and does not provide the site-specific information necessary to refine any understanding of the nature and extent of flooding affecting the development.

In particular, the FRA does not provide design flood levels, climate change flood levels, existing floor levels, proposed finished floor levels, flood depths, flood hazard information, or any assessment of the consequences of flooding to the proposed residential use. Whilst the FRA states that floor levels will be above the 1 in 100 year flood level, no supporting information level survey, flood level data or modelling evidence has been submitted to demonstrate this.

Furthermore, the assessment does not demonstrate how the proposed floor levels relate to the relevant future design flood level allowing for climate change. Where finished floor levels are relied upon to mitigate flood risk, the FRA should demonstrate that they provide an appropriate level of protection against future flood risk over the lifetime of the development, as set out in the Policy Guidance.

Given the site's location within Flood Zone 3 and the introduction of residential accommodation, a proportionate FRA should, as a minimum, identify the relevant design flood levels affecting the site, including climate change; confirm existing and proposed levels; assess the flood risk to the development; and demonstrate whether any mitigation measures are necessary to ensure the development is safe for its lifetime.

In the absence of this information, the Environment Agency cannot determine whether the proposal satisfies the flood risk requirements of the NPPF and PPG and therefore objects.

## **Summary**

We object to the application because insufficient information has been submitted to demonstrate that the proposed development will be safe for its lifetime. The submitted FRA does not provide the site-specific flood risk information necessary to understand the flood risk affecting the development, assess future flood risk associated with climate change, or demonstrate that appropriate mitigation measures have been incorporated where required.

### **Overcoming our Objection**

The applicant should contact the Environment Agency's Wessex Enquiries Team to obtain the best available flood level information for the site. A revised Flood Risk Assessment should use this information to identify the relevant design flood levels affecting the development, including consideration of climate change, and demonstrate that the proposal will be safe for its lifetime.

The objection may be overcome by submitting a revised, proportionate Flood Risk Assessment which:

- Identifies the relevant design flood levels affecting the site, including climate change where appropriate.
- Provides existing site levels and existing and proposed finished floor levels.
- Demonstrates the relationship between the proposed finished floor levels and the relevant design flood levels.
- Assesses the flood risk to the development and its occupants and demonstrates that it will be safe over the development lifetime.
- Identifies any flood mitigation measures necessary to make the development safe and demonstrates their effectiveness.
- Confirms how flood risk will be managed throughout the lifetime of the development.

### **Access, Egress and Emergency Planning**

This response is limited to fluvial flood risk matters within the Environment Agency's remit. Consideration of safe access and egress, residual flood risk, emergency planning arrangements, and occupant safety are matters for the Local Planning Authority, informed by its Emergency Planning advisers where appropriate.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us

to make further representations.

Yours sincerely,

Briony Waterman,

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