

Wiltshire Council Planning Consultation Response

5 May 2026

Andrew Minting
Senior Conservation Officer
Wiltshire Council Conservation (South)

Officer's Name:Becky Jones
Officer's Title: Senior Planning Officer

Application No: PL/2025/09973
Site Address Portway House, Old Sarum SP4 6EB
Proposal: COU to 20 apartments (Class MA prior approval)

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☐	Support in principle
☐	Support subject to conditions (as set out below)
☒	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that special regard be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 212-5 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

Class MA (MA.2(2)(e)) provides that where a site lies within a CA and conversion of the ground floor is proposed, the LPA shall consider 'the impact of that change on the character or sustainability of that area'.

Site and assets considered:

Portway House sits within the Old Sarum Airfield Conservation Area, immediately to the east of the grade II listed former Station Headquarters and to the north east of Hangar 3, one of a grade II* listed group of Belfast truss hangars and workshops. The building forms part of the Administrative character area of the CA, as described in the 2006 designation report (Atkins). The airfield's historic buildings all sit parallel with the Portway, the Roman road from Old Sarum to Silchester.

Planning History

S/1999/0637 Single storey extension (linking the two original buildings) Approved 16/06/1999

15/07952/FUL Reroofing the main office block Approved 16/12/2015

Also relevant, PL/2023/07368 and PL/2024/00102 for works on the airfield and to Hangar 3.

Proposal

Change of use of the whole building to 20 residential apartments. Removal of temporary structures surrounding the building.

Airfield noise/hangar 3

Assessment

A detailed heritage statement has been provided, setting out the history of the buildings of the site and the nature of their uses. The buildings form a close group with the Station HQ to the west and are of related 'RAF expansion period' architectural design. The main block, with its two attached 'Haskard' ranges, has remained in office use since construction as the Army Co-operation School Building in 1936. The eastern block was the infirmary and of similar date.

The CA as a whole comprises the historic airfield with its various functional areas (Administrative, Flying, Technical, Domestic). The 2006 appraisal notes that the Administrative area has suffered the most loss of its airfield-related buildings, and much of this area is now occupied by modern industrial units/warehouses. A post-MOD boundary fence divides the application site from the Station HQ and interrupts the airfield's principal road. The avenue of trees lining this road, with only a few losses, makes a positive contribution and provides a degree of visual continuity that counteracts the modern fence.

The buildings make a positive contribution to the character and appearance of the CA and the setting of the Station HQ. The external changes proposed are very limited, other than the removal of the temporary enclosures of the previous occupier.

The proposed change of use would introduce a residential use into an otherwise entirely commercial area, and see an end to the long-term administrative use of the building. The comings and goings of people during the daytime and overnight vacancy would be reversed, with this then being the only building occupied overnight. Public perception of an office building is very different from that of residential blocks, which are by nature inaccessible and forbidding. The loss of the more accessible public use would by itself fail to preserve the character of the CA.

The COU would raise another concern with regard to the future viability of other buildings in the CA, due to the potential for noise complaints about the occupiers of existing airfield buildings, such as the hangar very close to the southern corner of the site. It would be extremely unfortunate if residents were to gain leverage over flying or any other noisy airfield activity.

I am not fully conversant with the marketing of the site with regard to the potential for another office use but would hope to see convincing evidence to support a change of use. Ultimately, the building needs to be reused and, to some degree, any use that retains the building in its largely unaltered external form is positive, however the COU would be a permanent arrangement with no realistic possibility of reversion to office, and this should only be considered with near-absolute certainty that there are no less harmful alternatives.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The change of use would fail to preserve the character and significance of the Old Sarum Airfield CA, contrary to the aims of the PLBCA Act 1990, NPPF and CP58 and is considered to be inadequately justified.