



Chartered Town Planners
Royal Town Planning Institute

ATLAS

PLANNING GROUP

PLANNING STATEMENT

29A CASTLE STREET

Salisbury

SP1 1TT

April 2026

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Appendices

Appendix A - Pre-application response (ENQ/2025/01318)

Appendix B - Myddelton and Major Letter (March 2026)

INTRODUCTION

- 1.1 This Statement has been produced by Atlas Planning Group in support of an application seeking full planning permission for the change of use of (Use Class E) commercial unit to a single four-bedroom dwelling at 29A Castle Street, Salisbury, SP1 1TT. Listed Building Consent is also sought for various internal and external alterations.
- 1.2 The Statement will assess the development proposal in the context of national and local planning policy found within the National Planning Policy Framework (2024), the Wiltshire Core Strategy (2015) and the Wiltshire Design Guide (2024).

SITE DESCRIPTION

- 2.1 The application site relates to a Grade II listed building which was formerly used as a (Use Class E) sunbed studio. The site is situated on the western side of Castle Street and lies within the Salisbury Conservation Area. Residential and commercial properties surround the site in all directions, and the former sunbed studio is located within the Secondary Shopping Area as defined by Saved Policy S2 of the Salisbury District Local Plan (2011).
- 2.2 The site is accessed via a long narrow alleyway off Castle Street. Externally, the Listed building comprises three storeys and features red brickwork with metal framed windows under plain clay roof tiles.



Figure 1 - Aerial view of application site



Figure 2 - Existing front facade



Figure 3 - Existing alleyway off Castle Street



Figure 4 - Existing ground floor entrance

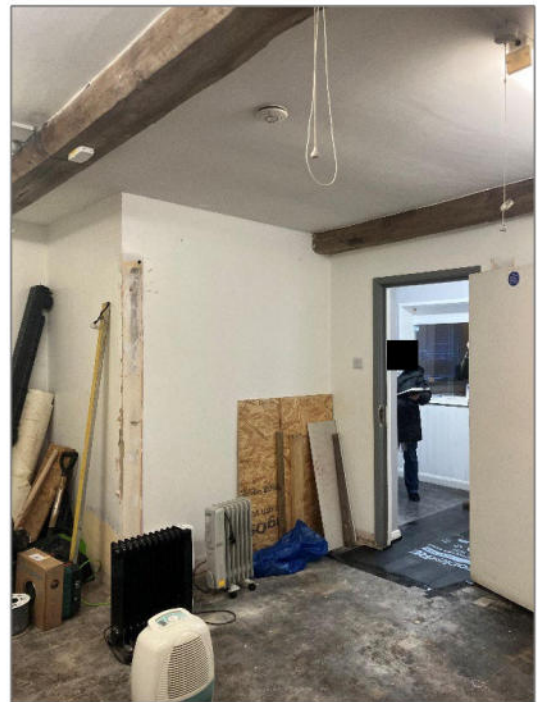


Figure 5 - Former treatment rooms



Figure 6 - Existing first floor office



Figure 7 - Existing second floor meeting room



Figure 8 - Exposed historic beams and trusses

RELEVANT PLANNING HISTORY

3.1 The application site has relevant planning history:

FULL PLANNING PERMISSION - S/2002/2376

3.2 In November 2002, an application was submitted to Salisbury District Council seeking full planning permission for the change of office space into sunbed studio use. The application was approved in January 2003.

LISTED BUILDING CONSENT - S/2003/1524

3.3 Listed Building Consent was granted for the infilling of existing doorway, installation of a new wall and creation of new doorway in September 2003.

LISTED BUILDING CONSENT - S/2003/1889

3.4 Listed Building Consent was granted for the conversion of existing building to dental surgery in October 2003.

FULL PLANNING PERMISSION - S/2003/1656

3.5 Full planning permission was granted for the change of use of part of ground floor from office to D1 (chiropractic) use in September 2008.

FULL PLANNING PERMISSION & LISTED BUILDING CONSENT- S/2010/0193 & S/2010/0194

3.6 In February 2010, an application was submitted to Salisbury District Council which sought full planning permission and Listed Building Consent for the insertion of two conservation rooflights and internal alterations. Planning permission and Listed Building consent were granted in April 2010.

PRE-APPLICATION ENQUIRY - ENQ/2024/00007

3.7 In October 2025, pre-application advice was received from Wiltshire Council which has some direct relevance to the proposals subject of the current application (Officer response included at **Appendix A**).

3.8 Overall, it was considered that a lack of information had been submitted relating to the significance of and impact on the Grade II Listed building. Concerns were also raised relating to the introduction of a dwelling in a commercial area. However, the Council confirmed that the principle of the conversion and loss of the commercial use could be acceptable. This Statement therefore seeks to address the concerns raised by the Officer and set out how the scheme is policy compliant.

THE PROPOSAL

4.1 The proposals seek full planning permission for the change of use of (Use Class E) commercial unit to a single (Use Class C3) four-bedroom dwelling. Listed Building Consent is also sought for various internal and external alterations.

4.2 The description of development is as follows:

“Internal and external alterations and change of use of (Use Class E) commercial unit to a single (Use Class C3) four-bedroom dwelling with associated works”

4.3 Large parts of the building are already domestic in form and character, and the proposals seek to utilise the existing arrangement of the building to create sensitive and logical room divisions for a single four-bedroom family home.

4.4 Several internal and external alterations are proposed which are essential to facilitate the re-use of the building for residential purposes. These predominantly relate to the insertion of new partitions, the replacement of existing windows with dark grey metal frames and the insertion of a new conservation style rooflight.

4.5 Ultimately, the proposed change of use and associated alterations will not have a material impact on the external appearance of the former commercial unit, and the proposals will facilitate the provision of a high-quality home in a highly sustainable city centre location.

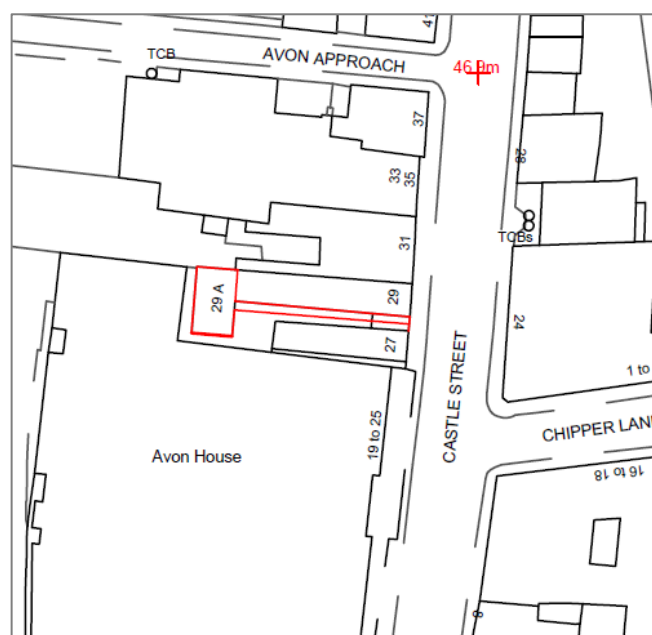


Figure 9 - Proposed site plan

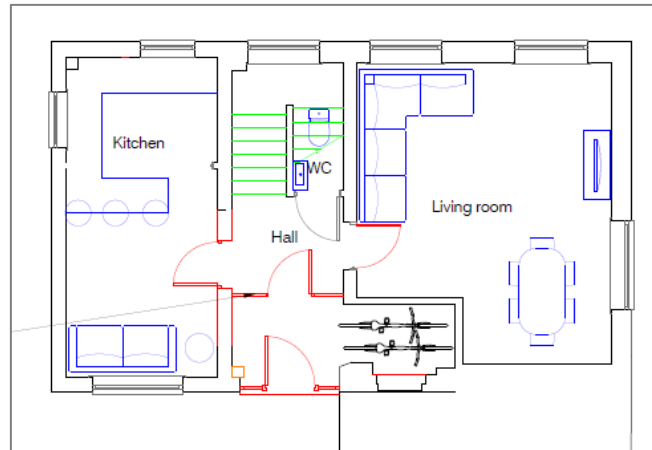


Figure 10 - Proposed ground floor plan

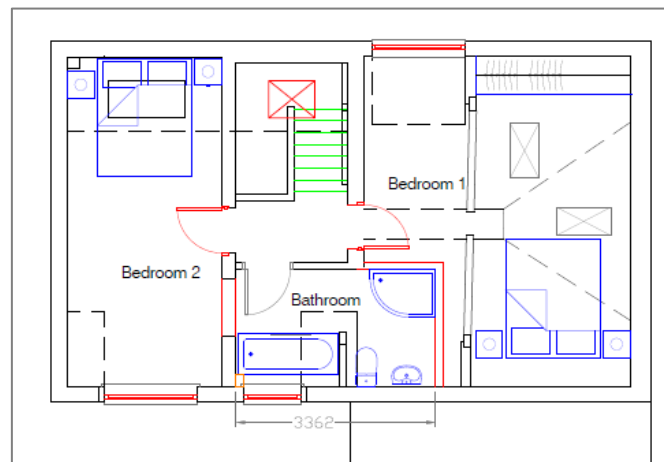


Figure 11 - Proposed first floor plan

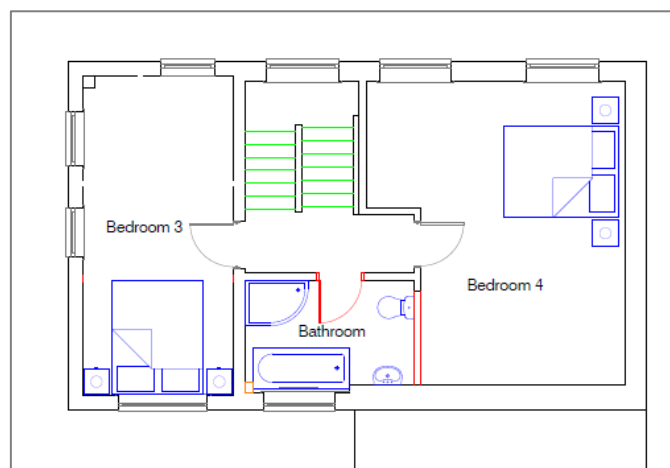


Figure 12 - Proposed second floor plan

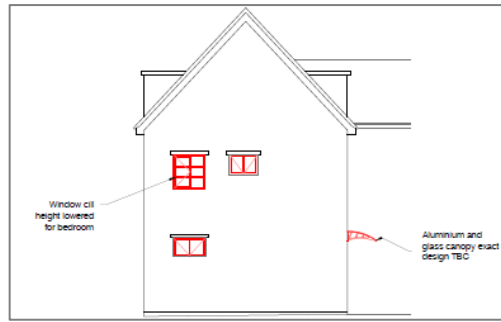


Figure 13 - Proposed south elevation

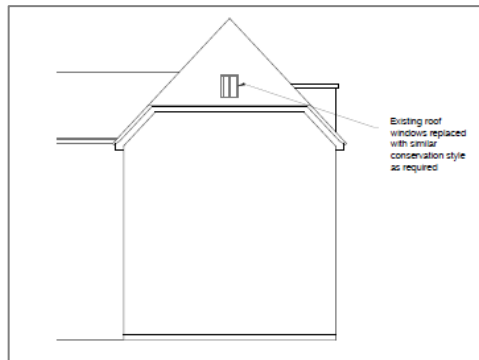


Figure 14 - Proposed north elevation



Figure 15 - Proposed east elevation



Figure 16 - Proposed west elevation

PLANNING CONSIDERATIONS

- 5.1 Wiltshire Council's Core Strategy (2015) is the Council's primary Development Plan Document, and the starting point for determining planning decisions, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. There are also several Saved Policies of relevance from the Salisbury District Plan (2011).
- 5.2 The National Planning Policy Framework (NPPF) (2024) provides a national tier of policy and decision-making guidance for the planning system and forms a material consideration for planning decisions.
- 5.3 The Salisbury Neighbourhood Development Plan (2020-2038) was adopted in February 2025 and forms a material consideration for any decision making within the area.
- 5.4 The Council is in the process of adopting a new Local Plan. In November 2024 the Draft Local Plan was submitted to the Secretary of State for Examination, sessions for which commenced in late 2025. However, following correspondence from the Inspectors in December 2025, the Examination has been paused and currently no weight can be attributed to the emerging Local Plan.
- 5.5 The policy and guidance contained within the statutory Development Plan Documents and all other relevant material considerations have been reviewed to see if the proposal is an appropriate form of development for the application site.
- 5.6 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 of the NPPF requires proposals that accord with the Development Plan to be approved without delay.

PRINCIPLE OF DEVELOPMENT

- 5.7 Core Policy 1 of the Wiltshire Core Strategy sets out the 'Settlement Strategy' for the county and identifies four tiers of settlement - Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. Only the Principal Settlements, Market Towns, Local Service Centres and Large Villages have defined limits of development/settlement boundaries.
- 5.8 Core Policy 2 of the Wiltshire Core Strategy sets out the 'Delivery Strategy'. It identifies the scale of growth appropriate within each settlement tier, stating that within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.

- 5.9 The site lies within the defined settlement boundary of Salisbury and Salisbury Central Area. The former sunbed studio is also located within the Secondary Shopping Area as defined by Saved Policy S2 of the Salisbury District Local Plan (2011).
- 5.10 We acknowledge the concerns raised in the pre-app advice related to the loss of the commercial use and how Para 9.9 of the SDLP sets out that the purpose of Policy S2 is to control changes of use to non-retail activities to ensure that ***“the vitality of these areas continues, and where possible is improved to provide attractive shopping environments”***.
- 5.11 However, the specific locational characteristics of the site, being accessed via a long narrow alley off Castle Street, means that the building’s frontage does not actively contribute to the vitality of the Secondary Shopping Area or provide an attractive shopping environment.
- 5.12 Indeed, the building was last used as a sunbed studio, but it has been vacant since September 2024. Myddelton & Major were engaged prior to the pre-application submission, and it has been confirmed that the likely demand for the site as a commercial premises would be low primarily because of its discreet location.
- 5.13 In this instance, it is pertinent to highlight that permitted development rights exist in relation to the change of use within the Commercial, Business and Service Use Class (E) to residential (C3) Use under Schedule 2, Part 3, Class MA of the General Permitted Development Order (2015) (as amended).
- 5.14 Although the application building does not benefit from these rights because it is Listed, such legislation clearly indicates the Government’s intentions of boosting the delivery of homes in unused and vacant commercial buildings.
- 5.15 By virtue of the fact that there is no Article 4 direction covering the Salisbury Central Area which restricts the change of use of (Use Class E) buildings to (C3) residential, and notwithstanding the PD right under Class MA excludes development involving a listed building or its curtilage, it would be shortsighted to disregard that the loss of a commercial use in the Secondary Shopping Area could be established under the prior approval process.
- 5.16 As will be set out in the following sections, the current application seeks to re-purpose a designated heritage asset in a low-demand commercial location, as affirmed by Myddelton and Major (Letter included at **Appendix B**), and it is considered that the benefits would be of a scale and nature that would outweigh the heritage harm associated with the loss of the historic commercial use.

- 5.17 Moreover, the NPPF requires each Local Planning Authority to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement, or four years' worth of housing if they have an emerging Local Plan at an advanced stage of preparation.
- 5.18 A Briefing Note (No.24-20) published by Wiltshire Council on the 18th June 2025 confirms that the Council cannot demonstrate the required five-year housing land supply and can only demonstrate a **2.42 year supply**.
- 5.19 Footnote 8 of the Framework confirms that for applications involving the provision of housing, policies should be considered out of date where *"the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78)"*.
- 5.20 This means the presumption in favour of sustainable development as set out at Paragraph 11 d) of the NPPF is engaged, and planning permission for housing must be granted unless the adverse impacts significantly and demonstrably outweigh the benefits of doing so.
- 5.21 Further, the Salisbury City Area Framework is a key planning consideration. This includes objectives to re-purpose heritage buildings, under-utilised rear courtyards and upper floors. It explains that there are often challenges associated with these spaces. However, ***"where redevelopment to provide new homes is possible, this could have significant positive impacts on the availability of housing in the city centre. Re-use of the existing building stock in the city centre is a low carbon option for delivering housing"***.
- 5.22 Existing buildings are inherently low carbon as they have not had to be built from scratch so there is a reduced carbon cost in construction. Additionally, the city centre location supports car-free lifestyles, as city centre services and facilities are available without the need to travel far.
- 5.23 On this basis, and particularly due to the specific locational characteristics of the site where the existing commercial unit does not actively contribute to the vitality or vibrancy of the city centre, the principle of development should be considered acceptable.

DESIGN AND HERITAGE IMPACT

- 5.24 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out at Section 66 (1) that in considering whether to grant planning permission for development that affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its

setting, or any features of special architectural or historic interest it possesses. With regards to Conservation Areas, the parallel duty at Section 72 (1) is to pay special attention to the desirability of preserving or enhancing the character of that area.

5.25 Core Policy 57 requires a high standard of design in all new developments, including extensions, alterations, and changes of use of existing buildings, whilst Core Policy 58 states that development should protect, conserve and where possible enhance the historic environment.

5.26 Paragraph 210 of the NPPF states that in determining applications [that affect heritage assets], *“local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and **putting them to viable uses consistent with their conservation;***
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.”*

5.27 The Grade II listed building lies within the Salisbury Conservation Area. Historic England’s List Entry states:

CASTLE STREET 1. 1594 (West Side) Nos 27, 29, 29A (including premises to rear of No 29A at west end of yard) SU 1430 SW 1/402 II GV 2. Mid to later C19. 3 storeys red brick symmetrical front. Heavy rusticated stone quoins, carved up into parapet with moulded coping. Moulded string between storeys and heavy moulded cornice. The upper floors have central window and flanking superimposed brick bays also with heavily rusticated quoins, the cornice and parapet breaking forward over, and with moulded stepped bases at 1st floor level. Sash windows segment headed, centre windows wider, no glazing bars. Central archway with rusticated surround on ground floor. Altered modernised shop fronts either side. To the rear of No 27 is a 3 storey timber framed tile hung wing C17 or early C18, with jettied 2nd floor. Hipped old tile roof. To the rear of the yard adjoining the wing of No 29A at right angles is a former warehouse, mid C17. Queen post roof with butt purlins and plain wind braces.

5.28 The Grade II listed building first appears on the Salisbury town map of 1880, and the mapping throughout the 20th century indicates that the footprint of 29A Castle Street has remained unchanged.

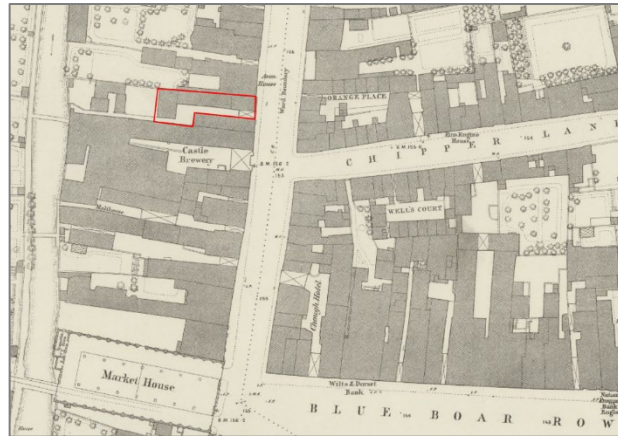


Figure 17 - Salisbury town map (1880)



Figure 18 - Ordnance survey (1901)

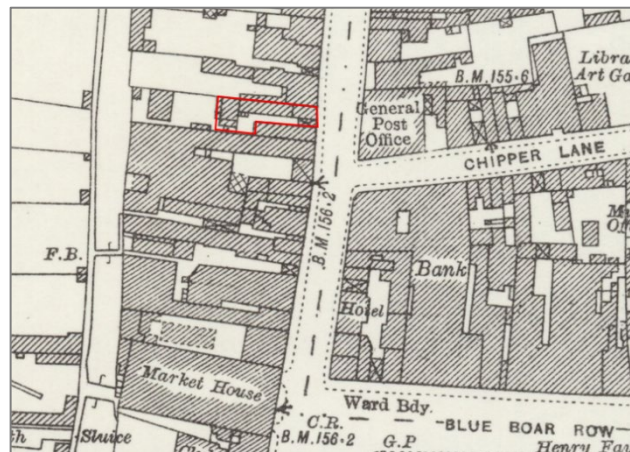


Figure 19 - Ordnance survey (1926)

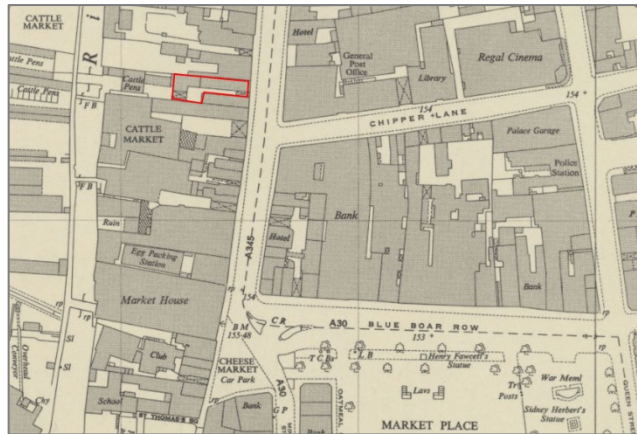


Figure 20 - Ordnance survey (1954)



Figure 21 - Ordnance survey (1967)

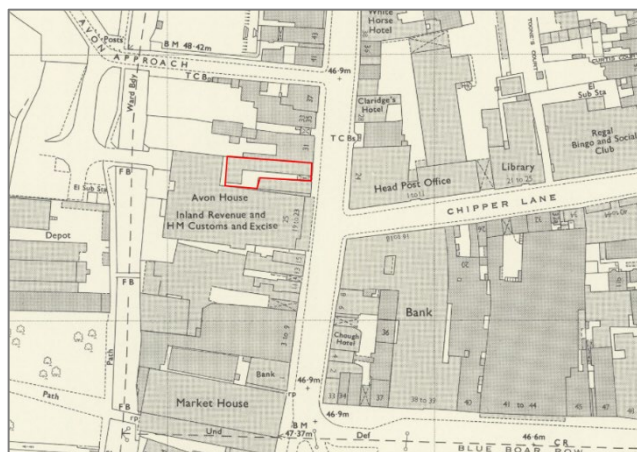


Figure 22 - Ordnance survey (1972)

- 5.29 Internally, there are historic beams and trusses exposed below the ceilings, but the internal alterations throughout the early 2000s has resulted in several modern partitions which have limited heritage value.
- 5.30 It is proposed that some of the modern partitions and existing fittings are removed to form new usable rooms, and the glazed partition serving the existing ground floor kitchen will be blocked up. New partitions will also be created to form the new family bathroom and ensuite serving bedroom 2. Overall, the existing plan form will largely remain unchanged, and the exposed beams, trusses and existing window openings will be preserved.
- 5.31 Externally, the roofslope will continue to be barely visible from the wider Conservation Area, and the insertion of the additional conservation style rooflight and replacement of existing windows with dark grey metal frames would not be harmful to the external appearance of the building or its setting.



Figure 23 - Exposed beams and trusses

- 5.32 Whilst the proposed change of use of the commercial unit would result in a loss of the significance to the listed building, this would be ‘less than substantial’, and the proposals seek the re-use of an existing building in the city centre as a low carbon option for delivering housing. This should be considered a significant benefit of the proposals.
- 5.33 Since there will be little to no change to the way that the building contributes to the Conservation Area, it is considered that the heritage benefits would be of a scale that would outweigh the identified less than substantial harm in line with the requirement of paragraph 215 of the NPPF.
- 5.34 Accordingly, it is considered that there is no conflict in the proposed development with the statutory duty in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF and Core Policy 58.

RESIDENTIAL AMENITY

- 5.35 Core Strategy Policy 57 ‘*Ensuring High Quality Design & Space Shaping*’ requires development to ensure the impact on the amenities of existing occupants/neighbours is acceptable and ensure that appropriate levels of amenity are achievable within the development itself.
- 5.36 In terms of accommodation and future occupant amenity, the dwellinghouse would comply with the Nationally Described Space Standards and Wiltshire Design Guide (2024), providing good quality and spacious living areas. All habitable rooms would also enjoy sufficient sunlight and daylight through the existing windows.
- 5.37 Although the scheme does not include any private external amenity space, the site is situated in close proximity to several green spaces surrounding the city centre, being 0.48km from Elizabeth Gardens and approximately 1.1km from Greencroft Park.
- 5.38 Therefore, the site is located in a highly sustainable location where public amenity and green spaces would be easily accessible for future occupiers.
- 5.39 In any case, it is usual for residential properties in town centre locations to not be served by external amenity space. The Council agreed with this position when assessing a comparable residential development at No.27 Castle Street, stating “*There would be no external amenity space to the other units within the conversion. This is usual in town centre locations where flats and apartments are provided above shops and commercial premises and it is accepted that the location is accessible to*

public amenity and green spaces in relatively close proximity” (Application reference: 20/03521/VAR and 20/04099/LBC).

- 5.40 In terms of noise, the dwelling would not be situated in an area where industrial noise pollution would occur. Although the property would be situated within the secondary shopping area, the neighbouring commercial uses operate during daytime hours only, and the new dwelling would be a compatible use with the adjacent dental surgery.
- 5.41 Further, the proposed dwelling would be set 30 metres back from Castle Street, and there are intervening buildings which would provide a degree of acoustic mitigation against bus engine noise. This means that external noise intrusion would likely be far below the desirable targets.



Figure 24 - Intervening buildings between front facade and Castle Street

- 5.42 After all, the Council considered the 4 x Use Class C3 flats at No.27 to be a compatible use under application 19/09941/FUL, and the four-bedroom dwelling would produce no more noise and disturbance than the existing commercial use.
- 5.43 New openings are limited to the insertion of a conservation style rooflight on the flat roof extension. Given there will be no changes to any of the existing external openings, and when considering the inter-relationship between the application site and flats at No.27 that already exists, the proposals will not give rise to any harm in terms of in-looking, overlooking or loss of privacy.
- 5.44 For these reasons, the proposal accords with Core Policy 57.

HIGHWAYS AND PARKING

- 5.45 Wiltshire Core Policy 60 seeks to help reduce the need to travel, particularly by car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire through a series of initiatives, and together with Core Policy 62 seeks to mitigate any adverse impact on the transport network on transport users, local communities and the environment.
- 5.46 Whilst the dwelling would not be served any designated car parking spaces, the site lies within the city centre and the existing building does not offer any dedicated parking provision. The location is highly sustainable and in close proximity to a range of services, facilities, transport and employment opportunities.
- 5.47 The Local Highway Authority were consulted during the pre-app and confirmed that there would be no objection to a car-free development. Since there has been no change in circumstances or policy, there should now be reason to deviate from that view.
- 5.48 Additionally, the adopted CAF provides an ambitious set of recommendations which include reducing motor vehicle movements through the city whilst ensuring the city remains accessible to all through supporting public transport, cycling and walking. Secure bicycle and bin storage has been incorporated into the design which will be sufficient to meet the needs of future occupiers.
- 5.49 On this basis, the scheme is acceptable in highways terms.

ECOLOGY

- 5.50 Paragraph 187 of the NPPF requires decisions to contribute to and enhance the natural and local environment. Core Policy 50 requires proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale. The policy also requires all proposals to incorporate appropriate mitigation measures to avoid and reduce disturbance on sensitive wildlife species and habitats. All development should also seek to maximise opportunities to enhance biodiversity.
- 5.51 In terms of protected species, the current application predominately relates to minor internal alterations to facilitate the change of use.

- 5.52 Whilst the works also include the insertion of a rooflight, there are no gaps or missing tiles in the existing roof. It is therefore considered that the proposal will have a negligible impact on protected species.
- 5.53 The site is within the catchment of the River Avon Special Area of Conservation (SAC). SACs are protected under The Conservation of Habitats and Species (Amendment) Regulations 2019. These are a network of sites designated for supporting habitats or species of high nature conservation importance in the European context. Any activity that has a detrimental effect on these European sites is made an offence under the Regulations.
- 5.54 As this site falls within the catchment of the River Avon SAC, the proposal has the potential to cause adverse effects alone or in combination with other developments through the discharge of phosphorus in wastewater. Following a Cabinet: 6 February 2024 Revised Nutrient Neutrality Strategy, the Council has revised its approach for developments requiring nutrient credits in the Hampshire Avon. A Council-led scheme of phosphorus credits is available for planned development at a fix cost per kilogram of phosphorus, provided supply of mitigation is available.
- 5.55 Given the position of the site within the city centre, the proposals would constitute ‘planned development’. Therefore, the application is accompanied by a nutrient calculation to determine the number of credits required.
- 5.56 Accordingly, the development will not place any harm on protected species in-line with NPPF Para 193 and Core policy 50.

FLOOD RISK

- 5.57 Paragraph 174 of the NPPF makes clear that applications for 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.
- 5.58 The Technical Guidance to the NPPF explains that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 5.59 NPPF Para 181 states that *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood risk assessment”*.

5.60 The majority of the site lies within Flood Zone 1. However, the access to site is situated in Flood Zone 3 and at high risk to surface water flooding. Additionally, the site is also in an area susceptible to groundwater flooding and the proposed dwelling would be a 'more vulnerable' use in accordance with the PPG's Flood Risk Vulnerability Classification.

5.61 Therefore, this application is supported by a site-specific Flood Risk Assessment and Flood Evacuation Plan produced by Aegaea (February 2026).

5.62 The Flood Risk Assessment concludes:

- The overall risk of surface water flooding and other sources including underground water, sewer and reservoir is low.
- The proposals do not include additional built footprint and will not increase surface runoff from the site.
- Although the change of use and associated works would not result in any material impact with regards to flood risk, a Flood Evacuation Plan and flood resilient measures have been provided to ensure safe access and egress can be achieved and minimise the damage in the case of a flooding event.

5.63 Moreover, while the site is located in close proximity to the River Avon where there is high risk of fluvial flooding, the Salisbury River Park Project is due to be completed this year. This flood alleviation scheme will provide critical improvements to help mitigate flood risk along Castle Street.

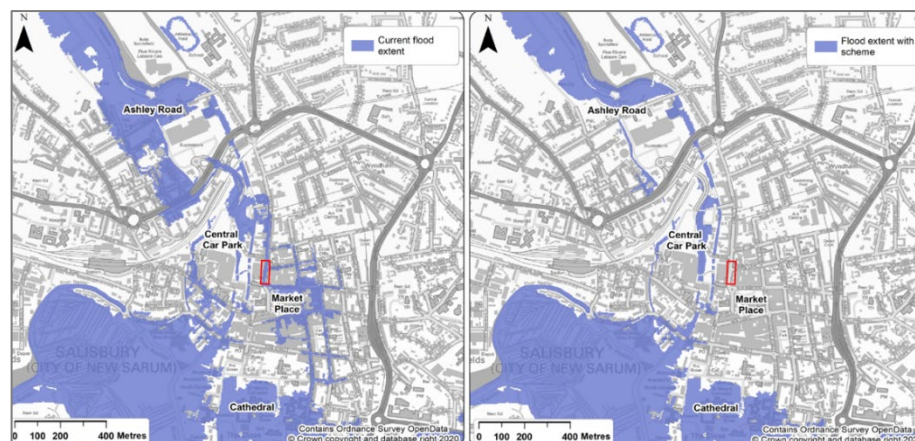


Figure 25 - Flood risk extents pre and post flood alleviation works

- 5.64 Based on the modelling carried out to inform the design of the alleviation scheme, the application site will be removed from the 1:100-year extent post-scheme with flooding remaining in-channel as it flows past the site.
- 5.65 Although we accept that the flood alleviation scheme has not been completed, the Lead Local Flood Authority, Environment Agency and Planning Authority must consider this when determining the application
- 5.66 As such, the current application should be considered acceptable with regard to flood risk.

PLANNING BALANCE AND CONCLUSIONS

- 6.1 This application seeks full planning permission for the change of use of (Use Class E) commercial unit to a single four-bedroom. Listed Building Consent is also sought for various internal and external alterations.
- 6.2 The site relates to a Grade II listed building located within Salisbury's Secondary Shopping Area and is accessed via a long narrow alley off Castle Street. The specific locational characteristics of the site means that the building's frontage does not actively contribute to the vitality of the city centre or provide an attractive shopping environment in its current form.
- 6.3 Whilst the change of use would give rise to some heritage harm through the loss of the shop front, this would be less than substantial, and the re-use of the existing building stock in the city centre as a low carbon option for delivering housing should be considered a significant benefit of the proposals.
- 6.4 The Salisbury City Area Framework seeks to promote city-centre urban living, incorporating a mix of typologies and tenures, and this proposal will help meet these objectives. Indeed, Wiltshire Council is currently unable to demonstrate a 5-year housing land supply, and the proposed scheme is deliverable.
- 6.5 For the above reasons, we respectfully ask that Wiltshire Council approve this application without delay.

A

Application No:	ENQ/2025/01318
Application Type	Pre-Application enquiry
Proposal:	Change of use from commercial to residential and listed building consent for internal alterations/repairs
Location:	29A CASTLE STREET, SALISBURY, SP1 3RH
Case Officer:	Hayley Clark

Dear Sir/Madam,

Thank you for your pre-application enquiry received on 20/08/2025.

Please note that the advice below represents an officer's informal professional opinion based on the information provided at the time of writing. It is given without prejudice to any formal decision the Council may make on a subsequent planning application.

Any future application would be subject to full assessment, including site publicity and consultation, and other material considerations may emerge through that process. This advice is based on current adopted planning policies and guidance available at the time of writing.

Summary of Officer View

Based on the information provided, the proposed development is considered to be unacceptable as it is not possible to assess the impacts on the listed building without some form of heritage assessment to aid understanding of the existing building its historic fabric and how the development will impact on this. The site is also located within the city centre within the secondary shopping area adjacent to Tescos and in close proximity to a number of commercial properties, the introduction of a dwelling in close proximity to and in what is essentially a commercial area is likely to lead to conflict with amenity for future occupiers of the site and in return potential impacts on the existing businesses should noise/disturbance on the residential use occur. A formal application is therefore not recommended, the response below provides further detail on the issues.

Constraints:

The site is subject to the following relevant planning designations and constraints:

Is within a Secondary Shopping Area

Is within the Salisbury Conservation Area

Is within an Area of Special Archaeological significance

Is within River Avon SAC

Is within the 13.8km zone of influence for the New Forest internationally protected sites, which comprises the New Forest SPA, New Forest SAC and New Forest Ramsar site

Is a grade 2 listed building adjacent to many other listed buildings.



Relevant Planning History:

Proposal / Summary
S/2002/2376 - Full planning permission Decision - Approve with Conditions Date: 30/1/2003 – CHANGE OFFICE SPACE INTO SUNBED STUDIO USE
S/2003/0556 - Full planning permission Decision - Approve with Conditions Date: 23/4/2003 – OFFICE (B1) TO DENTAL SURGERY (D1) AND TREATMENT ROOMS
S/2003/1524 - Listed building consent Decision - Approve with Conditions Date: 16/9/2003 – TO FILL IN TWO EXISTING DOORWAYS AND CREATE TWO NEW ONES BUILDING A NEW WALL IN THE LARGEST ROOM TO CREATE TWO ROOMS BUILDING A NEW DOORWAY INTO A TOILET AND STORE ROOM
S/2003/1656 - Full planning permission Decision - Approved Date: 22/9/2003 – CHANGE OF USE OF PART OF GROUND FLOOR FROM OFFICE TO D1 (CHIROPRACTIC) USE
S/2003/1889 - Listed building consent Decision - Approve with Conditions Date: 16/10/2003 – TO CONVERT EXISTING BUILDING TO DENTAL SURGERY
S/2005/1675 - Listed building consent Decision - Approve with Conditions Date: 11/10/2005 – INTERNAL ALTERATIONS & 3 NEW ROOFLIGHTS
S/2009/1855 - Full planning permission Decision - Withdrawn Date: 8/2/2010 – 2 NO CONSERVATION TYPE ROOFLIGHTS ON NORTH ELEVATION
S/2009/1856 - Listed building consent Decision - Withdrawn Date: 8/2/2010 – 2 NO CONSERVATION ROOFLIGHTS AND INTERNAL IMPROVEMENTS
S/2010/0193 - Full planning permission Decision - Approve with Conditions Date: 12/4/2010 – 2 NO. CONSERVATION ROOFLIGHTS
S/2010/0194 - Listed building consent Decision - Approve with Conditions Date: 12/4/2010 – 2 NO. CONSERVATION ROOFLIGHTS AND INTERNAL ALTERATIONS

Relevant Planning Policies:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this pre-application enquiry are listed below:

National Planning Policy Framework
Nation planning Policy Guidance
National Design Guide

Planning (Listed Building and Conservation Areas) Act 1990 – S16, 66 and 72

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 20 Spatial Strategy Salisbury Community Area;
- Core Policy 22 Salisbury Central Area
- Core Policy 35 Existing Employment Land;
- Core Policy 45 Meeting Wiltshire's Housing Needs;
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 55 Air Quality;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;

- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 64 Demand Management
- Core Policy 67 Flood Risk;
- Core Policy 69 River Avon SAC;

Salisbury District Local Plan – saved policies

E3/H7 - Salisbury Central Area

S2 - Secondary Shopping Area: Secondary Shopping Area

S3 - Salisbury City Centre

Made Neighbourhood Plans:

Salisbury Neighbourhood Plan

Supplementary Planning Document:

Wiltshire Design Guide

Creating places Design guide

Salisbury Conservation Area Appraisal and Management Plan

Salisbury Central Area Framework

Assessment

Principle of Development

Wiltshire Core Strategy Policies CP1 (Settlement Strategy) and CP2 (Delivery Strategy) set out the spatial strategy for sustainable development across Wiltshire. These policies direct new development to the most sustainable locations, primarily within the limits of development of market towns, local service centres, and large villages. Proposals outside these limits are generally only supported in exceptional circumstances.

The site lies within the settlement boundary of Salisbury. Core Policy 1 and Core Policy 20 define Salisbury as a Principle Settlement. Core Policy 2 states within the limits of development there is a presumption in favour of sustainable development in principal settlements. The principle of development can therefore be considered acceptable having regard to Core Policies 1, 2 and 20 of the Wiltshire Core Strategy.

The site is however an existing commercial premises and is located within the Salisbury Central Area and Secondary Shopping Area where the retention of commercial premises is preferred and considered compatible with adjoining/adjacent uses. However, should full justification and evidence be provided that the premises is no longer required or seen suitable for other small businesses in this central city location then the principle of conversion/loss of this use could be acceptable.

The above in principle acceptability is however subject to compliance with other relevant policies and guidance and materials considerations such as amenity, heritage, highways and ecology.

Character, design and heritage

Policy CP57 of the WCS seeks to ensure that all development proposals are of a high standard of design that responds positively to the local context and contributes to a sense of place. This includes consideration of layout, form, materials, scale, and relationship to the surroundings. Proposals should reinforce local distinctiveness, protect the character of settlements, and promote inclusive and attractive environments.

Policy CP58 of the WCS requires development to protect, conserve and, where possible, enhance the historic environment, including the character and setting of heritage assets. This reflects the approach in Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraphs 212–221 of the NPPF. Where harm to a heritage asset is identified, there must be clear and convincing justification.

The application site relates to a grade 2 listed building, internal and external alterations are proposed to facilitate the conversion from commercial use to residential use. Alterations include

the replacement of all windows with UPVC;

the replacement of the front door

At ground floor - removal of internal wall to remove WC and create an open plan kitchen/diner works to create a new WC

At first floor – removal of internal walls to create bedroom 1 with en-suite and dressing room; subdivision of former office to create bedroom 2 with ensuite

At second floor - two options are shown both include changes to the internal walls either removal or the addition of, to create a further 2 bedrooms with en-suites or a single larger family bathroom. Addition of a new roof light over the stairs

No heritage assessment has been provided to ascertain how the proposals will impact on the historic fabric of the building and therefore how the works will impact on its significance. The starting point of any project relating to works to a listed building really should be to gain as much understanding of the existing building to use as a foundation upon which to base ideas and works going forward. Without this basic assessment and understanding it is not possible for Officers to comment on the acceptability in terms of impact on the listed building itself and therefore can only consider that the proposals would be unacceptable.

Amenity

Policy CP57 also includes a requirement that development should ensure a high standard of amenity for existing and future occupants (point vii). This includes safeguarding privacy, outlook, natural light, and protection from noise, disturbance, and overbearing effects.

The proposals are to convert a three storey building to create a 4 bed dwelling, the site is very constrained with no outside space, there are significant concerns regarding the amenity of future occupiers of the site with the lack of outside space for a family as well as no waste storage provision or parking or cycle storage. In terms of appropriate amenity for a family with children to use this property as their home it is not considered appropriate and is unlikely to be supported going forward.

There are also concerns regarding the return impacts from the introduced residential use in such close proximity to and surrounded by other commercial uses. Should future occupiers of the dwelling be disturbed, this could potentially lead to complaints and future harmful impacts on neighbouring businesses.

Should you decide to proceed against officer advice, a noise assessment would be required to support any planning application.

Highway Safety and Parking

Policies CP60 to CP64 set the transport and accessibility framework for development in Wiltshire. Proposals must provide safe and suitable access for all users and should not have a severe impact on the transport network. The Highways Authority has been consulted and has provided the following comments-

The site is located in the city centre in easy walking distance of employment opportunities, amenities, facilities and public transport links that future occupiers may require.

The proposal is for a car free development and PS6 in the Wiltshire Local Transport Plan (Residential Parking Standards) states that reduced residential parking requirements will be considered where any parking overspill can be controlled - parking around the application site is mainly controlled by double yellow lines but also with pay and display and resident parking permit bays.

It is therefore considered that as the application accords with PS6 in the Wiltshire Local Transport Plan I am able to accept a car free site.

I therefore raise no highway objection.

Ecology and Biodiversity

Policy CP50 seeks to conserve and enhance biodiversity across Wiltshire. Development should avoid harm to protected species and habitats and provide net gains in biodiversity wherever possible.

BNG

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) applications are required to deliver 10% Biodiversity Net Gain (BNG). It applies to most but not all development.

Any small scale (non-major) or major scheme that you may decide to pursue on this site will therefore need to demonstrate that no net loss and a minimum of 10% net gain in biodiversity on the site is to be provided, in line with the requirements of the NPPF, WCS policy CP50 (Biodiversity and Geodiversity) and the Environment Act.

Details of the current baseline (using UK Habitats Classification) and a demonstration of the net gain calculation, using the current version of the metric and presented as unlocked spreadsheets, will be required in support of your application. Please see this link for further information: [Understanding biodiversity net gain - GOV.UK](#).

In line with NPPF and with CP50, applications that do not fall into the category where BNG is required, must still ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, it is expected that gains for biodiversity.

Please see the Council's website for more guidance [Biodiversity and development - Wiltshire Council](#)

River Avon SAC

This development falls within the catchment of the River Avon SAC. The development therefore has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. An Appropriate Assessment (AA) under Section 63 of the Habitats Regulations must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects. However, as you may be aware, the government released an update to the National Planning Policy Framework on 19 December 2023 along with a range of other guidance and policy documents. This included a statement from the Minister of State, Lee Rowley MP, on 20 December relating to nutrient neutrality. The council is obliged to consider all this new information before making decisions on planning applications. Sufficient information will therefore need to be submitted with any application at this site. Such information should include a phosphorous nutrient calculation; and a strategy of proposed mitigation. This will confirm what measures will be adopted to avoid and mitigate phosphorus burdens in the river system. Guidance on completing the phosphorus budget is available on our website [Phosphorus and nitrogen mitigation - Wiltshire Council](#). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

New Forest SAC

The proposed development site lies within the 13.8km zone of influence for the New Forest internationally protected sites, which comprises the New Forest SPA, New Forest SAC and New Forest Ramsar site. Therefore, the application is screened into appropriate assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) on account of its potential to cause adverse effects on the New Forest protected sites through increased recreational pressure which may occur alone and in-combination with other plans and projects. Many of the special features of the New Forest protected sites afforded protection are vulnerable to adverse effects associated with an increase in recreation as demonstrated in Natural England's supplementary advice issued for the SPA on 19 March 2019 and for the SAC on 18 March 2019.

Following a Cabinet decision on 7 May 2024, Wiltshire Council's "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1.1, 21 March 2023) is being revised. Cabinet approved revised mitigation measures to manage recreational pressures on the New Forest protected sites, including the cessation of use of Community Infrastructure Levy (CIL) to fund Strategic Access Management and Monitoring (SAMM) measures for minor residential development (1-49 dwellings) and tourism / visitor accommodation within the 13.8km zone of influence. Instead, SAMM

measures are to be funded by developer contributions at a rate of £612 (plus legal fees) per unit of residential or tourism accommodation. This revision applies to all development that will result in a net increase in accommodation units within the 13.8km zone of influence from the New Forest protected sites and therefore applies to this application. Evidence for the revised approach derives from the New Forest SAMM Report (Footprint Ecology, October 2023) which can be found here: [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority](https://www.newforestnpa.gov.uk/research-into-recreational-use-of-the-new-forest-s-protected-habitats) (newforestnpa.gov.uk). The New Forest SAMM Report was commissioned by all the local planning authorities with areas lying within the 13.8km zone, in order to identify and implement a consistent strategic approach to mitigation across the zone of influence.

It will therefore be necessary for developer contributions of £612 per dwelling / tourism unit (plus legal fees) to be secured via s111 agreement, unilateral undertaking or s106 agreement for this application to ensure the necessary mitigation is secured. This will enable the Council to conclude, subject to endorsement from Natural England, that the development proposed by means of this application will not lead to significant adverse effects on the New Forest protected sites alone or in-combination with other plans and projects.

Flood Risk and Drainage

Policy CP67 aligns with national policy (NPPF, para 159–169) and requires that development avoids increasing flood risk on-site or elsewhere. Development within Flood Zones 2 or 3 should be subject to the sequential and (if necessary) exception tests. Sustainable drainage systems (SuDS) should be incorporated for all major developments.

The site is located within flood zone 1 but is at moderate risk of groundwater flooding with groundwater level between 0.025m and 0.5m below the ground surface.

The NPPF para 172 states that

*All plans should apply a sequential, risk-based approach to the location of development – taking into account **all sources of flood risk** and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*

Para 174 of the NPPF 2024 is clear that development should be restricted in flood zones: -

The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

Annex 3 of the NPPF provides the flood risk vulnerability classification. Dwellings are in the “More vulnerable” use.

The Planning Practice Guidance (PPG) explains that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding and that the NPPF sets these strict tests to protect people and property from flooding which all local planning authorities are expected to follow and where these tests are not met, national policy is clear that new development should not be allowed.

The sequential test is the first stage in addressing flood risk.

Any ‘Minor’ development proposals for residential development require a sequential test. This is because residential development other than change of use in flood zones 2/3 is unacceptable in principle unless there are no alternative sites available for development to meet the housing needs of the authority in flood zone 1.

The only exclusions (taken from Planning Practice Guidance- PPG) - are as follows:

You also don't need to do a sequential test if either of the following apply:

- *the development is a minor development – but see below for definition of Minor in context of flooding:*

- *the development involves a change of use (e.g. from commercial to residential) unless your development is a caravan, camping chalet, mobile home or park home site*

The proposals relate to a change of use only from commercial to residential and therefore no sequential test is required.

However, as part of any formal planning submission a site specific flood risk assessment will be required due to the ground water flood risk of the site.

Procedural Advice and Consultation Expectations

Applicants should be advised of the Council's procedures for submitting a planning application - [Apply for planning permission - Wiltshire Council](#).

It is advised that should you decide to proceed with a formal application that you engage with neighbouring properties. Early engagement can help to identify and resolve issues at an early stage, potentially improving outcomes and reducing delays during the formal application process.

Advice regarding Building Regulations

It is likely that your proposal will require separate approval under the Building Regulations. The Surveyor who deals with your area can be contacted on 0300 456 0113. They are happy to provide you with free Building Regulation advice on this proposal and discuss this project further. This will help to ensure that the final decisions are compliant with the Building Regulations and may help save you time and money.

Closing Summary

This advice is offered in good faith based on current policy and guidance. While it provides a helpful steer, it cannot prejudice the outcome of any future planning application. Please ensure that any submission is fully supported by the required information and that material considerations identified above are addressed.

Should you require further assistance, please do not hesitate to contact us.

Yours faithfully

Head of Development Management

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Conservation and Planning Officer
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Our Ref: DS/JW/20082

15 April 2026

O Heasman Esq
Atlas Planning Group
Bodenham House Barn
Bodenham
Salisbury
SP5 4EN



Dear Mr Heasman

Re: 29a Castle Street, Salisbury

I refer to our discussions regarding your client's planning application for the conversion of this commercial unit to a single four-bedroom dwelling.

You have asked me to provide my professional opinion on the suitability of this accommodation as a commercial unit.

The property relates to a former sunbed studio with office space arranged over ground, first and attic floors. It is approached from Castle Street via a narrow alleyway between other commercial and residential buildings. It offers no profile or discernible presence to an occupier as a commercial unit due to its discreet location.

The interior of the accommodation is arranged as small individual rooms finished to a basic standard. The total floor area comprises 968 sq ft. (90 sqm)

Demand for office accommodation in Salisbury remains extremely weak. In 2025 we recorded a total take up of just under 11,000 sq ft. This reflects a continuing picture of low demand for office accommodation in the period since the end of the Covid 19 pandemic, as businesses switch how they operate. Flexible and home working has become prevalent and changes in technology mean that businesses that are growing are able to do so without the need to take on significant new floor space.

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15 April 2026

O Heasman Esq

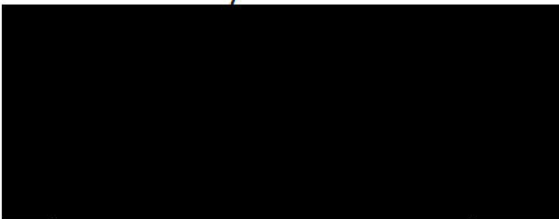
Where we have seen take up in the last couple of years, it has primarily been demand for better quality accommodation, with refurbished space at buildings such as Warner House and Milford House attracting tenants who now require better quality accommodation with the benefits of good light, open plan space with air conditioning and other facilities. Demand for smaller, lower quality space has been much weaker.

I am of the opinion that this accommodation, if offered to let as a retail unit or offices, will struggle to find tenants. This view is borne out by examples such as small office suites at Cheviot House in Castle Street. Although the building is situated within a secondary retail location, the quality of accommodation and approach is poor meaning and it has limited street presence. Suites ranging from 562 to 974 sq ft in this building have been vacant for upwards of 2 to 3 years without finding new tenants, notwithstanding flexibility on rent and terms.

It demonstrates that poorer quality accommodation in a weak position is less likely to be attractive to business occupiers in the modern environment.

I hope this is helpful to you and if you require any further information, please do not hesitate to contact me.

Yours sincerely



D A Speer MRICS

Partner

Email: deanspeer@myddeltonmajor.co.uk