

07 May 2026

Dear Sir,

Town and Country Planning (General Permitted Development) (England) Order 2015

Application No:	PL/2025/09973
Proposal:	Prior Approval under Part MA of the GPDO for the change of use of Class E space to form 20 apartments (Class C3).
Location:	PORTWAY HOUSE, OLD SARUM PARK, OLD SARUM, SALISBURY, SP4 6EB
On Behalf Of:	Jayne Lomax C/O Benchmark Planning

I refer to your application for a determination as to whether the prior approval of the local planning authority will be required for this development.

The local planning authority has determined in this case that its prior approval will be required as to:

- the impacts of noise from commercial premises on the intended occupiers of the development;
- the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; and
- the impact of the change of use on the character or sustainability of the conservation area.

and that this **prior approval is REFUSED for the following reason(s):**

1. On the basis of the information submitted, the proposal fails to demonstrate that acceptable living conditions can be achieved for future occupiers, particularly in relation to night time noise impacts from surrounding commercial activity. The submission does not demonstrate that acceptable living conditions can be achieved for future occupiers in accordance with Wiltshire Council guidance, ProPG, BS 8233, BS 4142, or the Noise Policy Statement for England. The proposal therefore fails criterion (d) which requires the LPA to determine whether the prior approval of the authority will be required for the impacts of noise from commercial premises and the existing airfield uses on the intended occupiers of the development.

The site is situated within a Principal Employment Area, which is retained in the Wiltshire Core Strategy for a full range of employment purposes. The submitted Noise Impact Assessment demonstrates that the site is affected by frequent and significant night time noise disturbance, including a very high number of LMax exceedances, substantial BS4142 rating level exceedances above background, and average noise levels requiring mitigation. The assessment does not clearly identify or control the sources of disturbance and relies predominantly on façade based mitigation to achieve internal compliance.

The proposal is considered to introduce a highly noise sensitive residential use into an established and allocated commercial area and airfield. The mitigation strategy relies on façade attenuation measures, with no meaningful consideration of source control, operational restrictions, or wider site based mitigation. This approach does not align with the mitigation hierarchy set out in ProPG or with Wiltshire Council's requirements for good acoustic design. In turn, the LPA considers that the proposal would increase the likelihood of future noise complaints from residents, placing unreasonable pressure on existing lawful commercial operations and the occupiers of existing airfield

buildings (such as the hangar very close to the southern corner of the site) contrary to the principles of the agent of change.

The proposals are therefore considered to be unacceptable in this regard and fail the requirements of criterion (g) which requires the LPA to determine whether the prior approval of the authority will be required for the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses.

2. The site is located within the Old Sarum Conservation Area. The building forms part of the Army School of Cooperation complex in the Administrative character area of the CA, as described in the 2006 designation report. The proposed change of use would introduce a residential use into an otherwise entirely commercial area (designated as a Principal Employment Area) and would end the long-term administrative use of the building. Daytime activity and night time vacancy would be reversed, making this the only building occupied overnight. Public perception of an accessible office building is very different to private, inaccessible residences. The loss of the more publicly accessible administrative use would by itself fail to preserve the existing character of the Conservation Area, to the detriment of its sustainability. The introduction of associated residential paraphernalia and activities would also be contrary to the established commercial character of the Conservation Area, further undermining its historically commercial character and function.

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 Conservation Area, contrary to the aims of The 1990 Act and the NPPF and is inadequately justified. The development would therefore fail criterion (e) which requires the LPA to determine whether the prior approval of the authority will be required for the impact on the character or sustainability of the conservation area.

The prior approval of the Local Planning Authority is therefore required in respect of criteria MA.2.(d), (e) and (g) of Schedule 2 Pt. 3 Class MA of the GPDO as amended and this prior approval is refused.

The officer report setting out the representation(s) received from the relevant consultee(s) is attached. This should be used to inform any further application for either prior approval or full planning permission.

Yours faithfully
Head of Development Management

INFORMATIVES

Operational Development With reference to the submitted Proposed Elevation plans, Class MA does not permit or authorise operational development. The applicant will need to secure any separate planning permission/s for any operational development required in association with the change of use including alterations to window/door openings and demolition of the lean to extension.

Habitat Regulations Reg 77, Nutrient Neutrality and New Forest Recreational pressures. The Applicant is reminded that the site is situated within the catchment of the River Avon Special Area for Conservation and New Forest Protected Sites and has potential to have an adverse effect upon the integrity of these European sites. This means that the development hereby assessed as being permitted development cannot be lawfully

commenced until the local planning authority, along with the appropriate nature conservation body, has made an Appropriate Assessment of the implications for the European site(s) under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (Habitat Regulations) and has confirmed that the proposals will not adversely affect the integrity of the site(s). It is therefore advised that the Applicant should consult with Natural England about the scheme and following their agreement, submit an application under Regulation 77 of the Habitat Regulations to the local planning authority for consideration and approval.

