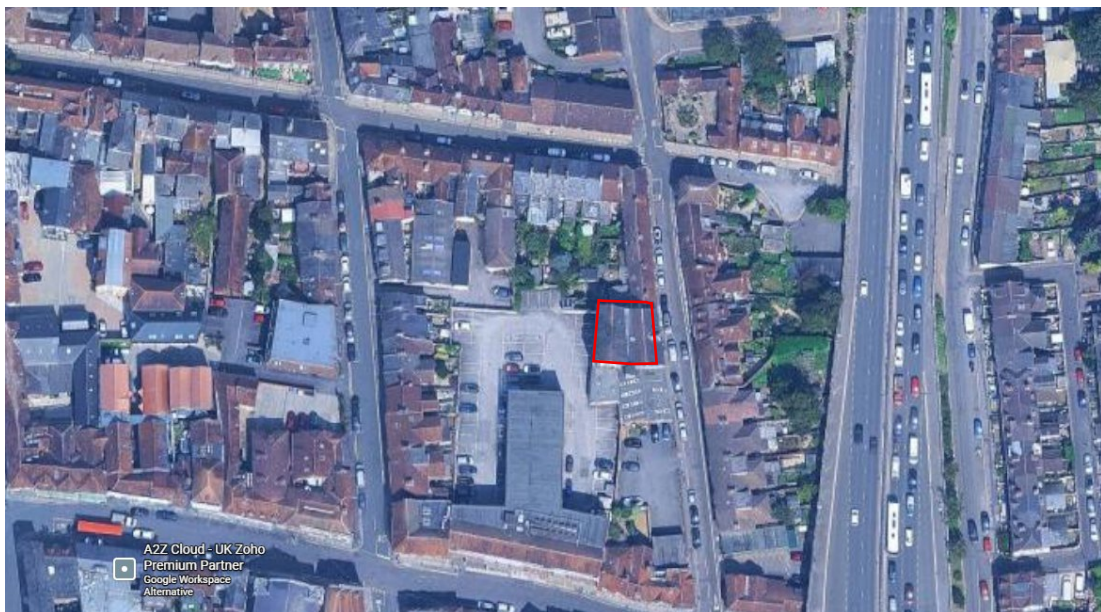


PLANNING STATEMENT

INCORPORATING HERITAGE ASSESSMENT

**PRIOR APPROVAL FOR THE CHANGE OF USE FROM
COMMERCIAL (CLASS E) TO RESIDENTIAL (CLASS C3) AT 16
GUILDER LANE, SALISBURY, SP1 1HW**



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

www.rawplanning.co.uk | admin@rawplanning.co.uk
RAW Planning Ltd | Company No. 11899496

CONTENTS:

	Page No:
1. INTRODUCTION	1
2. REQUEST FOR PRIOR APPROVAL	3
3. SUMMARY AND CONCLUSION	8

APPENDIX A - LETTER FROM ELAINE MILTON HERITAGE & PLANNING

1. INTRODUCTION

- 1.1 RAW Planning Ltd are instructed by Pelleas Homes Ltd (the “Applicant”) to prepare a Planning Statement to support an application to ascertain whether the Prior Approval of the Local Planning Authority (LPA) is required for the proposed change of use of a commercial building to a residential use at 16 Guilder Lane, Salisbury, SP1 1HW (the “Application Site”) in accordance with Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

The Application Site

- 1.2 The application site comprises a substantial three-storey terraced commercial building within Salisbury city centre, located on the eastern side of Guilder Lane. The building is understood to have historically operated as a corn stores building and retains a utilitarian warehouse character consistent with its former commercial function. Externally, the building is predominantly constructed in red brick, painted white at ground floor level, beneath a pitched tiled roof, with traditional arched detailing to the timber doors and windows. A single-storey element with a metal sheeted roof extends from the southern end of the building but does not form part of the current application.
- 1.3 Whilst the site falls within the Salisbury Conservation Area, the building itself is not listed and is not identified as a designated heritage asset. The surrounding area is varied in character, comprising a mix of commercial premises, converted buildings and residential properties typical of the wider Salisbury city centre context.

Existing Use

- 1.4 The building has historically accommodated a range of commercial uses including carpet warehousing, offices and storage, reflecting the longstanding commercial use of the site within Salisbury city centre. Most recently, the building was occupied by ‘Salisbury Printing’ in connection with commercial printing operations, together with ancillary office and storage areas. The lawful use of the building therefore falls within Use Class E and has operated continuously in such use for a period in excess of two years prior to the submission of this application. The building became vacant on 29th May 2026, however it is noted that the former vacancy requirement under Class MA was removed by legislative amendment in March 2024 and is therefore no longer a requirement of the prior approval process.

The Proposals

- 1.5 The proposal seeks the change of use of the existing building under Schedule 2, Part 3, Class MA of the GPDO to provide 8 self-contained flats. The submitted floor plans show a scheme comprising three

flats at ground floor level, three flats at first floor level and two flats at second floor level, providing a mix of 5 one-bedroom and 3 two-bedroom units.

- 1.6 The proposal has been designed to work with the existing layout and openings of the building and does not require any external alterations in order to facilitate the proposed residential use. The overall form, scale and architectural appearance of the building would therefore remain unchanged.
- 1.7 The submitted floor plans demonstrate that the proposed flats would provide an appropriate standard of accommodation for future occupiers. The accompanying Space Standards Checklist also confirms that all eight units meet the relevant internal space and storage requirements.
- 1.8 Overall, the proposal would secure the beneficial reuse of an existing commercial building within a highly sustainable city centre location through a proportionate form of residential conversion which respects the established built form and character of the site.

2. REQUEST FOR PRIOR APPROVAL

- 2.1 Class MA of Schedule 2, Part 3 of the GPDO allows for development consisting of the change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.
- 2.2 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 introduced Class E which recategorised previously separate use Class Categories for buildings being used for purposes such as retail, financial services, offices to carry out any operational or administrative functions, amongst others.
- 2.3 **Paragraph MA.1** of Part 3 of the Schedule 2 of the GPDO sets out the circumstances under which Class MA development is not permitted. The following paragraphs seek to demonstrate that the proposed development is permitted development, by addressing the circumstances set out in paragraph MA.1 using corresponding paragraph referencing (a-g):
- (a) N/A - Was omitted from the legislation under Textual Amendment [F41](#) Sch. 2 Pt. 3 Class MA para. MA.1(1)(a) omitted (5.3.2024) but included for completeness:
 - (b) The application building has been in lawful Use Class E use for a continuous period of at least two years prior to the date of the application.
 - (c) N/A - This criterion was omitted from the legislation under Textual Amendment [F42](#) Sch. 2 Pt. 3 Class MA para. MA.1(1)(c) omitted (5.3.2024) but included for completeness.
 - (d) The unit is not located within the curtilage of a site of special scientific interest, a listed building, a scheduled monument, a safety hazard area or a military explosives storage area.
 - (e) The unit is not located within a National Landscape, an area specified by the Secretary of State for the purposes of Section 41(3) of the Wildlife and Countryside Act 1981, the Broads, a National Park or a World Heritage Site.
 - (f) The unit is not occupied under an agricultural tenancy.
 - (g) N/A - This criterion only relates to applications submitted before 1 August 2022.
- 2.4 **Paragraph MA.2** of Part 3 of Schedule 2 of the GPDO states that:

“Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to –

- (a) Transport impacts of the development, particularly to ensure safe site access;*
- (b) Contamination risks in relation to the building;*
- (c) Flooding risks in relation to the building;*
- (d) Impacts of noise from commercial premises on the intended occupiers of the development;*
- (e) Where –*
 - (i) the building is located in a conservation area; and*
 - (ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area*
- (f) The provision of adequate natural light in all habitable rooms of the dwellinghouses;*
- (g) 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*
- (h) Where the development involves the loss of services provided by –*
 - (i) a registered nursery, or*
 - (ii) a health centre maintained under Section 2 or 3 of the National Health Service Act 2006*

The impact on the local provision of the type of services lost

- (i) Where the development meets the fire risk condition, the fire safety impacts of the intended occupants of the building”.*

2.5 The following paragraphs deal with each of the matters for which prior approval may be sought.

(a) Transport Impacts of the Development, Particularly to Ensure Safe Access

2.6 The application site occupies a highly sustainable location within Salisbury city centre where a wide range of day-to-day services and facilities are readily accessible on foot. Salisbury Railway Station is located approximately 0.8 miles west of the application site, equating to approximately a 15-minute walk, and provides direct rail connections to London, Southampton, Bath, Bristol and Exeter. A number

of bus stops are also located within comfortable walking distance of the site. The proposal therefore benefits from excellent accessibility to sustainable transport modes, reducing future reliance on private car use.

- 2.7 The site is within close proximity to a number of public car parks serving Salisbury city centre, including Culver Street Car Park which is located approximately 0.1 miles from the application site. In practical terms, the proposed residential use is not dependent upon dedicated on-site parking provision in order to function effectively. Secure cycle parking could be secured by condition should the Local Planning Authority consider it necessary.
- 2.8 Furthermore, the proposed residential use is unlikely to generate a greater level of vehicle movements than the historic commercial use of the building. The site has historically accommodated printing, office, warehousing and storage activities which would have generated regular staff, servicing and delivery movements associated with its commercial operation. In comparison, the proposed residential use is likely to result in a lower level of daily vehicular activity overall.
- 2.9 It is also relevant that Wiltshire Council has approved a number of prior approval applications for residential conversion schemes within Salisbury city centre where no dedicated on-site parking provision has been provided, reflecting the highly sustainable nature of the city centre and the reduced reliance on private car ownership in such locations. This includes schemes at 7-9 Fish Row, Salisbury (ref: PL/2023/01416), 42-44 Chipper Lane, Salisbury (ref: PL/2023/02891) and 3-7 New Canal, Salisbury (ref: PL/2023/10405).
- 2.10 Overall, the proposal represents the reuse of an existing building within a highly sustainable city centre location and would not result in any unacceptable transport or highway impacts.

(b) Contamination Risks in Relation to the Building

- 2.11 The proposal relates to the reuse of an existing building and would not involve any excavation or ground disturbance works. No evidence has been identified to suggest that the building or site is affected by contamination which would give rise to unacceptable risks to future occupiers. The contamination prior approval matter is therefore satisfactorily addressed.

(c) Flooding Risks in Relation to the Building

- 2.12 The application building is located in Flood Zone 1 which has the lowest probability of flooding. In Flood Zone 1, the principle of residential development is acceptable.

(d) Impacts of Noise from Commercial Premises on the Intended Occupiers of the Development

- 2.13 The proposed change of use to residential is considered compatible with the surrounding city centre area which is characterised by a mix of commercial and residential uses and does not contain uses typically associated with significant noise generation.
- 2.14 Furthermore, the surrounding area is not characterised by heavy industry or intensive commercial activity which might otherwise give rise to unacceptable amenity impacts for future occupiers.
- 2.15 The building has historically operated in commercial use, which would have generated regular staff activity, servicing and deliveries associated with its lawful operation. In comparison, the proposed residential use is unlikely to generate the same intensity of activity and may reduce the potential for noise and disturbance associated with the historic commercial operation of the site.
- 2.16 It is considered that future residents would experience an acceptable standard of residential amenity, with no material conflict arising from nearby commercial activities. The noise prior approval matter is therefore satisfactorily addressed.

(e) The Impact of the Change of Use on the Character or Sustainability of a Conservation Area

- 2.17 A letter from Elaine Milton Heritage & Planning Ltd is attached at Appendix A. The letter considers the implications of the proposed Class MA change of use of 16 Guilder Lane, Salisbury, from commercial, business and service use to 8 residential flats, having particular regard to the site's location within the Salisbury City Conservation Area.
- 2.18 The letter explains that the building subject to the application is a three-storey former corn stores located on the eastern side of "Swayne's Chequer". The building has a distinct historic warehouse character, constructed in red brick with traditional loading doors at first and second floor level and a winch dormer above. The letter describes the surrounding townscape as a mix of historic building forms and uses, including adjacent Grade II listed timber-framed buildings and predominantly residential properties within the immediate locality.
- 2.19 Reference is also made to the adopted City of Salisbury Conservation Area Appraisal and Management Plan (2014), which identifies the area as historically mixed-use in character. However, the letter notes that the surrounding environment is now predominantly domestic in scale and appearance, with the application building and adjacent gym annexe representing the principal non-residential uses within this part of the conservation area.
- 2.20 The letter concludes that the proposed residential use would sit comfortably within the prevailing character of the area and would not result in harm to either the character or sustainability of the

Salisbury Conservation Area. The proposal is therefore considered to comply with the heritage-related prior approval requirements of Class MA.

(f) The Provision of Adequate Natural Light in all Habitable Rooms of the Dwellinghouses

- 2.21 The application is accompanied by an Internal Daylight and Sunlight Study prepared by Model Environments Ltd which assesses the provision of natural light within all habitable rooms of the proposed flats. The assessment has been undertaken in accordance with BRE BR209 (2022) and BS EN 17037.
- 2.22 The study confirms that all 18 habitable rooms within the proposed development meet or exceed the relevant daylight standards and that all living rooms also achieve the recommended levels of sunlight. The report concludes that all habitable rooms would be provided with adequate natural light.
- 2.23 It is therefore considered that the proposal satisfies the requirements of paragraph MA.2(2)(f) of the GPDO.

(g) 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

- 2.24 The application unit forms a Class E use building within a city centre location. The site is not occupied by or in close proximity to any general or heavy industry, waste management or storage and distribution and as such the proposed change of use would not be adversely affected by such uses.

(h) Where the Development Involves the Loss of Services Provided by a Registered Nursery or a Health Centre

- 2.25 The application unit would not result in the loss of a Registered Nursery or a Health Centre.

(i) Where the Development meets the Fire Risk Condition, the Fire Safety Impacts on the Intended Occupants of the Building

- 2.26 The proposed development would create more than two dwellings; however, the building is below 18 metres in height and contains fewer than seven storeys. The development therefore does not meet the fire risk condition and fire safety is not a prior approval matter under Class MA.

3. SUMMARY AND CONCLUSION

- 3.1 Overall, it is considered that the proposed change of use comfortably complies with the requirements and limitations of Class MA, Schedule 2, Part 3 of the GPDO. The proposal would not give rise to any unacceptable transport, contamination, flooding or noise impacts. It has been demonstrated that the proposed flats would benefit from adequate natural light and provide an acceptable standard of residential accommodation.
- 3.2 The application is also supported by a Heritage Addendum which concludes that the proposal would sit comfortably within the prevailing character of this part of the Salisbury Conservation Area and would not result in harm to its character or sustainability.
- 3.3 The proposal therefore represents an appropriate and sustainable reuse of an existing commercial building within Salisbury city centre and it is respectfully requested that Prior Approval be granted in accordance with the details submitted as part of this application.

APPENDIX A

LETTER FROM ELAINE MILTON HERITAGE & PLANNING

Elaine Milton Heritage & Planning Limited

46 Moberly Road
Salisbury
Wiltshire
SP1 3BX



Mrs Alison Whalley
RAW Planning

26 May 2026

Via email

Dear Alison

Address: 16 Guilder Lane, Salisbury, SP1 1HW

Thank you for seeking my comments on the implications of the proposed Class MA application for the change of use of 16 Guilder Lane from 'commercial, business and service uses to dwellinghouses', in this case 8 flats. The property is located within the Salisbury City Conservation Area.

The Town and Country Planning (General Permitted Development etc) (England) (Amendment) Order 2021, allows for the type of change of use being proposed subject to a condition under Class MA.2 (2) (e) that if the proposal involves the conversion of whole or part of the ground floor, which in this case it does, there should be no adverse effect upon the 'character or sustainability of the conservation area'.

16 Guilder Lane occupies a plot on the east side of Swayne's Chequer. The property comprises a 3-storey former corn stores building (as illustrated on the plan on p93 of the RCHME volume for Salisbury). The building is constructed in red brick with the ground floor painted white and the opening arches and cills painted black. There are central loading doors on the 1st and 2nd floor with a winch dormer directly above. The ground floor loading door has been partly filled in and contains a window. Elsewhere on the ground floor, there is a series of standard width windows (containing 3 No. sashes) and a solid timber double door.

Immediately north is a terrace of 2-storey timber-framed and jettied houses, together Grade II listed. On the east side of the street are unlisted terraces of 2-storey brick or rendered houses, some with dormers.

The council's adopted City of Salisbury Conservation Area Appraisal and Management Plan (December 2014) describes the area as in a mix of uses, although apart from No.16 and

the adjacent single-storey gym annexe (No.18) the buildings are in residential use and the environs are predominantly domestic in scale and character.

I have reviewed the proposed ground, first and second floor plans for the conversion of No.16 to 8 No. flats produced by BAS Property Consultants Ltd (Drawing Nos. 26/26/200, 26/26/201 and 26/26/202).

The proposed use of No.16 for residential purposes would, in my view, sit comfortably with the prevailing character of this part of the conservation area and would not result in harm to its character or sustainability. On that basis, I consider that the proposal complies with the heritage-related prior approval matter under Class MA.2(2)(e).

I hope the above is helpful.

Yours sincerely,

Elaine Milton Bsc (Hons), MSc, DipArchCons, MRTPI, IHBC
Historic Buildings Consultant

RAW



RAW Planning

Website: www.rawplanning.co.uk