

DELEGATED REPORT

Application Reference: PL/2026/00652

Address: Portway House, Old Sarum Park, Old Sarum, Salisbury, SP4 6EB

Proposal: Proposed new vehicular, pedestrian access, and dropped kerb with removal of three temporary structures and replacement of trees

PROPOSAL

The applicant is seeking full planning permission for a new vehicular / pedestrian access with visibility splays and dropped kerb, with removal of three temporary structures and replacement of trees at Portway House. The new vehicular access would be formed onto Portway as a vehicular crossing of the footway, with a 5.5m wide access. Removal of an unspecified length of hedgerow is required.

SITE DESCRIPTION

The application site is one of a remaining group of buildings of the former Army School of Cooperation complex in the Administrative area of Old Sarum Airfield and Conservation Area. It is an existing office/workshop building formerly occupied by Wessex Archaeology and is within the settlement boundary for the Principal Settlement of Salisbury in the Special Landscape Area. The area is also designated as a Principal Employment Area (PEA). The site lies within the Area of Special Archaeological Significance. The Old Sarum House to the south east is Grade II listed.

The site is within Flood Zone 1 and no other sources of flood risk are identified by the 2024 SFRA. Portway is a Class C adopted highway. The site is within the New Forest Protected Sites 15km Recreation zone of influence and the River Avon Hampshire SAC which are protected sites for the purposes of para 11 of the NPPF.



Site Location Plan and splays



Front Elevation photo

As can be seen in the above elevation photo, this site consists of a two storey brick building that was formerly in B1 (office and workshop use). It is accessed from Roman Road via Old

Sarum Park and Lysander Road. There are 60 available on site parking spaces with 25 secure cycle spaces.

PLANNING HISTORY

S/1987/1188 Change of use from military use to workshops and offices for archaeological purposes Approved

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

S/1999/1363 temporary vehicular access onto Portway Road Approved

S/2011/0351 Replacement windows in Portway House Approved

15/07952/FUL Install new pitched roof over existing flat roof for main office block Approved 16/12/2015

18/07607/FUL Temporary siting for 5 years, of a two storey modular building to provide temporary office space during the refurbishment of Portway House. Approved

PL/2021/07335 Variation of condition 2 for application 18/07607/FUL - Temporary siting for 5 years, of a two storey modular building to provide temporary office space during the refurbishment of Portway House. Approved with conditions

PL/2023/07368 and PL/2024/00102 for works on the airfield and to Hangar 3

PL/2025/09973 Prior Approval Part 3, Class MA: Commercial, business and service uses to dwellinghouses Refused:

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 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 LAmax 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. 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, 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 Airfield 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.

POLICIES

Planning (Listed Building and Conservation Areas) Act 1990

Section 66: Special considerations affecting planning functions

Section 72: General duties of planning authorities

National Planning Policy Framework (NPPF 2024) and Planning Practice Guidance

Wiltshire Core Strategy (WCS):

Core Policy 1: Settlement Strategy

Core Policy 2: Delivery Strategy

Core Policy 20: Spatial Strategy: Salisbury Community Area

Core Policy 23: Old Sarum Airfield

Core Policy 34: Additional Employment Land

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 and Development

Saved Policy E1: Employment land at Old Sarum (Saved in Appx D of WCS)

MAIN PLANNING ISSUES

1. Principle of development
2. Scale, design, impact on the character of the Conservation Area and other heritage assets including archaeology, impact on trees.
3. Highway safety
4. No net loss of biodiversity, BNG, visibility and hedgerow removal
5. Neighbouring Amenity
6. Planning Balance

CONSULTATIONS

Conservation - Objection - see comments in full.

Highways – No objection subject to conditions

Archaeology – No objection subject to condition

Trees – No objection subject to conditions

Public Protection – no observations

Laverstock and Ford Parish Council - objection

Laverstock and Ford Parish Council OBJECT to this application due to unsafe access proposals which cannot provide sufficient access or exit for larger vehicles such as fire engines, without a swing onto the opposite carriage way of The Portway. Insufficient parking within the site will contribute to these issues, with vehicles likely to be parked outside of marked bays.

REPRESENTATIONS Third parties- none

ASSESSMENT

Planning permission is required for the development. The applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF confirms in para 11 that plans and decisions should apply a presumption in favour of sustainable. For decision making, that means approving development proposals that accord with an up-to-date development plan without delay. The site lies within the Conservation Area and therefore, under footnote 7, the presumption in favour of sustainable development would not automatically apply to this site.

1. Principle of development

The application site is an existing office building on the Old Sarum Park, formerly occupied by Wessex Archaeology and is within the settlement boundary for the Principal Settlement of Salisbury. The area is also designated as a Principal Employment Area (PEA).



PEA and settlement boundary

Core Policy 1 outlines the settlement strategy for Wiltshire and identifies the settlements where sustainable development will take place. Salisbury is a Principal Settlement and Core Policy 1 states:

Wiltshire's Principal Settlements are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres. They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure meeting their economic potential in the most sustainable way to support better self containment.

Core Policy 2 addresses the issue of development within settlement boundaries:

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.

CP35 (Existing employment sites) states:

Wiltshire's Principal Employment Areas (as listed in the Area Strategies) should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.

The principle of the development to form a new access to an existing building within the settlement and PEA is therefore acceptable in principle.

2. Scale, design, impact on the character of the Conservation Area and other heritage assets including archaeology, impact on trees.

The site lies within a Conservation Area and the building to the south east is Grade II listed. Portway House is considered an undesignated heritage asset:



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.

Wessex Archaeology occupied the Army School of Cooperation complex in the Administrative Area and it was built between 1935 and 1936. The area was originally occupied by WWI administration and domestic buildings, prior to the business park development, but now only retains the Expansion Period station headquarters, the sick quarters / infirmary and Army School of Cooperation buildings.

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 buildings

make a positive contribution to the character and appearance of the CA and the setting of the Station HQ.

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.

There is a duty placed on the local planning authority under section 66 of the Planning (Listed Building and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building and its setting. Section 72 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

The NPPF requires LPAs to consider the impact of a proposed development on the significance of a designated heritage asset and great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPF requires the LPA to identify whether there would be any harm to the significance of any designated heritage asset. If so, that harm must be weighed against the public benefits of the proposal.

Core Policy 57 of the WCS sets out the policy considerations for the development in terms of design principles. CP58 considers heritage matters and aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include listed buildings and conservation areas. Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.

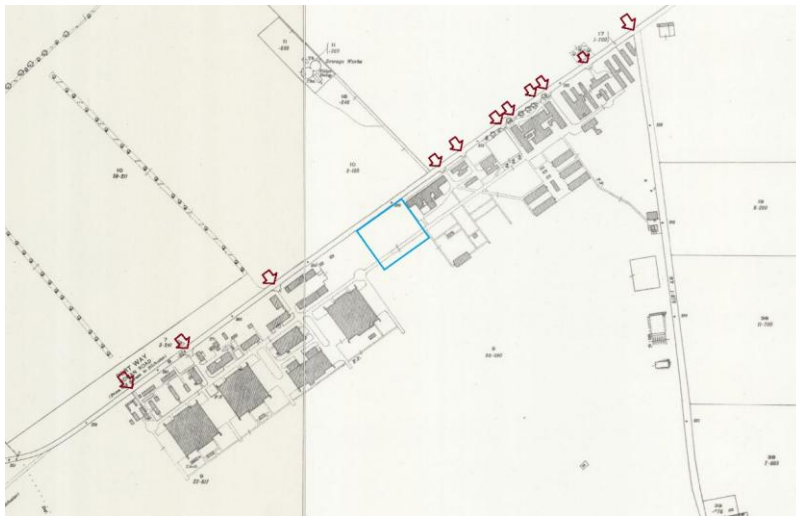
The conservation officer initially stated:

The application site is within the Old Sarum Airfield Conservation Area and immediately to the east of the grade II listed former Station Headquarters. The CA comprises a variety of function-specific areas, the site and its neighbour forming part of the Administrative area, both a short distance to the N of the grade II listed hangars and repair workshops. Historically the airfield buildings have only been accessible from the internal airfield roads. The only exception to this is the Station HQ (now TA) which became the main access point when constructed in 1935 - this access now only serves the TA building. This controlled enclosure of the site reflects its historic military use and gives the area a more clearly defined area than if buildings along the Portway were to have direct accesses. There are no obvious benefits to the CA nor setting of the listed building by the formation of the opening - visibility of the buildings is only slightly hampered by unpruned vegetation and the view of the rear courtyard/parking associated with Portway House wouldn't be desirable. I consider that the proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the CA and impact on the hierarchy of the CA's administrative buildings, contrary to the aims of sections 66 and 72 of*

the PLBCA Act 1990, the NPPF and CP58. It has not been shown that the building cannot reasonably sustain a use without provision of the new access.

Further details were submitted by the applicant to address the concerns in the form of a statement and contradicting the assertions regarding access from internal roads. They stated:

We have found evidence that contradicts this statement. Historic maps and aerial photographs show multiple external access points into the airfield from the Portway road, as well as the internal airfield roads. Eight or more external access points are evident on the OS maps published in 1926 and 1975, as well as on mid-C20th aerial photographs, such as the one below.



The available historic mapping, aerial photographic evidence and published heritage assessments do not support the view that the proposed access would erode the special character or appearance, legibility or significance of the Old Sarum Airfield Conservation Area, or harm the significance of the Grade II listed former Station HQ through a change within its setting. Rather, they demonstrate that multiple external access points historically existed from the Portway, and that the present restricted access arrangement is a comparatively recent arrangement within an administrative area already altered by later development, subdivision and enclosure.

The Conservation officer considered the submission and concluded:

The further information provided regarding historic accesses is irrefutable in establishing that there was not an impermeable roadside boundary between the airfield and the Portway. This photo helpfully shows the nature of some of them: https://historicensland.org.uk/images-books/archive/collections/aerial-photos/record/raf_540_59_sffo_0076

With regard to the accesses to the CA, it remains the case that vehicular access between airfield buildings has always been primarily along the internal roads. Maintaining the roadside boundaries without new openings better preserves the sense of distinct character areas between the public highway and the CA. No doubt this is a product of the layouts agreed when the business park areas were developed and is a beneficial one.

I would also observe that those accesses are all about the width of a field gate, apart from that at the Station HQ, and they didn't need 120m visibility splays. The deviation of the straight hedge line is certainly unfortunate but perhaps in itself it doesn't cause sufficient harm to the character of the CA.



What this photo also shows is the setting of Portway House as originally laid out, with a remarkably large formal lawn and garden between it and the flying area. It is hard not to believe that the building was not of the highest status at this time, and that perhaps the long used title 'Army School of Cooperation Building' is misleading, in that the whole establishment was the ASC. Everything of its grand southern elevation, layout and arrangements implies it had a greater significance than is currently understood.

I remain concerned that the new access would cause a degree of harm, albeit quite low in the 'less than substantial' range, and in the absence of a new use I consider it is insufficiently justified.

In conclusion, the proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the CA and impact on the hierarchy of the CA's administrative buildings, contrary to the aims of sections 66 and 72 of the PLBCA Act 1990, the NPPF and CP58. The less than substantial harm identified would not be outweighed by any demonstrable public benefits arising from the provision of the access.

Archaeology

CP58 is relevant and the archaeologist commented:

The applicant has included with their application an historic environment desk-based assessment (Wessex Archaeology, December 2025). In terms of the archaeological implications of the proposed new vehicular access, the assessment report notes (Para. 7.2.2) that 'There is some identified archaeological potential within the area, particularly for prehistoric and Romano-British activity, in particular the route of a Roman road may pass through the north-western area of the Site'.

The assessment report goes on to state (Para. 8.1.7) that 'Due to the general background potential for archaeologically significant remains to be present within the Site the archaeological advisor to Wiltshire Council may require mitigation works to be undertaken. This could take the form of archaeological monitoring and recording of any works considered to be of sufficient depth to pose a potential risk to any archaeological remains which may be present within the Site'.

I agree with Wessex Archaeology's conclusion and recommendations. A programme of archaeological monitoring and recording can be secured by the following condition.

The application, which has the potential to affect trees within the Conservation Area, is supported by a Tree Survey and Arboricultural Impact Assessment- March 2026 V1.0. It states:

The development requires the removal of T8 and T9. T8 and T9 are unremarkable trees of limited merit, and their loss will have a minimal impact on the visual amenity of the local area or the wider landscape. The proposed access will not encroach within the root protection areas of any of the retained trees. Any proposed re-surfacing will or may encroach within the root protection areas of T4, T5, T6, T7, T10, T11, G12, T13 and T16.

The activity required to construct the proposed development (vehicular movement, storage of materials, soft landscaping etc.) may encroach within the root protection areas of the retained trees if they are not properly safeguarded during the construction activity.

It will be necessary, prior to the commencement of any construction activity, to provide Wiltshire Council with an Arboricultural Method Statement, a Tree Protection Plan, and a Schedule of Arboricultural Supervision in order to safeguard the retained trees.

The construction activity should not adversely impact upon any retained trees if the specified precautions to be detailed within an Arboricultural Method Statement (please see section 10.0) and on the Tree Protection Plan are followed.



3. Highway Safety

CP57, 60 and 61 are relevant to the proposals. The Highways team have considered the scheme and requested further details including visibility. The highways officer initially stated:

Access

The site is located within an established residential and commercial area, with access to public transport and local facilities.

The highway network surrounding the site has generally good pedestrian facilities, but there is no segregated cycle provision, requiring cyclists to share the carriageway space. It should be noted that the Highway Report incorrectly states that "Shared footway/cycleways are available on both sides of Portway".

It is noted that the boundary hedges fronting the site onto Portway have encroached onto the footway, and these will require cutting back as part of the development, and thereafter maintained to provide better pedestrian provision.

In order to provide continuous accessible pedestrian facilities on Portway, my Transport Planning colleagues have also requested that dropped kerb provision is made to the southwest of the site access, as shown in the streetview image below, to facilitate the pedestrian movement from the site to the local facilities and public transport. Alternatively, a contribution of £10,000 towards such improvements to pedestrian/cyclist facilities should be secured.



The proposed new access would be of 5.5m width and located approximately 50 metres south-west of the junction with Westside Close, on the north-western side of Portway.

The access has been demonstrated, with swept path analysis, to appropriately accommodate emergency vehicles both at the access and within the site. It therefore follows that the site access and internal parking court can adequately accommodate smaller delivery vehicles also.

*The new access is indicated to achieve visibility splays of **2.4m by 120m** in each direction, in accordance with the standards set out in DMRB for a road subject to a 40mph speed limit. Such splays would need to be clear of obstruction at an above a height of 300mm above the adjoining carriageway level.*

The Proposed Site Plan, Drawing No. 1171/06A, indicates the retention of the existing access from Lysander Road which is indicated to serve as an emergency access. However, details of how this would be managed is required to be demonstrated.

Clarification is also required regarding the servicing of the site by service and refuse vehicles, where the Pre-application Highway Note states "due to the constraints of the site it is proposed that larger service vehicles and in particular refuse collection would continue to serve the site via Lysander Road to the rear."

The proposal would introduce new residential trips from the site with a direct access onto Portway, which would provide access to local facilities and public transport, and it is therefore considered that improvements to the pedestrian facilities would provide sustainable travel options for residents, and are considered necessary to make the development acceptable. directly related to the site, and fairly and reasonably related in scale.

As an alternative, the applicant may wish to carry out such works under a S278 Agreement with the Highway Authority

The boundary hedges fronting the site onto Portway will also need to be cut back as part of the development to improve the available footway width to encourage pedestrian movement.

Officer note – the applicant informally indicated willingness to take the S106 route.

Connecting access road between the car parking areas

Concerns had been raised in regard to the lack of intervisibility between the proposed waiting bay and vehicles approaching from the north adjacent to the building. Bellamy Roberts response contends that the arrangement has been used without “undue concern”.

The development utilises an existing constrained access arrangement, including a narrow internal link. While intervisibility is limited, the inclusion of a passing place enables vehicles to manoeuvre safely. It is therefore accepted that there are no grounds for a highway objection.

Summary and Recommendation

The Highway Authority has reviewed the submitted proposals alongside the applicant's Transport Consultant response dated 1 May 2026. The proposed access arrangements, internal layout, cycle provision and waste strategy are acknowledged to fall below ideal standards; however, it is accepted that there must be a degree of flexibility when considering the reuse of previously developed land.

Notwithstanding these constraints, it is considered that the development would not result in a severe impact on the safe operation of the highway network, and therefore a highway objection would not be sustainable.

Therefore, if the Planning Case Officer is minded to approve the application, it is recommended that an obligation under a Section 106 Agreement for a £10,000 contribution towards improvements to pedestrian facilities on Portway is secured. Alternatively, the applicant may wish to address this requirement through a condition on any permission to require the submission and approval of improvements to dropped kerb crossings on Portway, in the vicinity of the site, to improve pedestrian movement and connectivity to local facilities.

In conclusion, no highway objection is raised subject to conditions and a S106 Agreement being secured.

4. No net loss of biodiversity, BNG, visibility and hedgerow removal

The conservation officer has commented above on the impact of the loss of the hedgerow required for the highways visibility splay on the character of the CA:

“There are no obvious benefits to the CA nor setting of the listed building by the formation of the opening - visibility of the buildings is only slightly hampered by unpruned vegetation and the view of the rear courtyard/parking associated with Portway House wouldn't be desirable.”

“I would also observe that those accesses are all about the width of a field gate, apart from that at the Station HQ, and they didn't need 120m visibility splays. The deviation of the straight hedge line is certainly unfortunate but perhaps in itself it doesn't cause sufficient harm to the character of the CA.”

With reference to the loss of the hedgerow, the highways officer recommended a number of conditions in the event that the application is approved. Of particular relevance are:

Hedge / Footway Improvement

Prior to occupation, the hedge fronting Portway shall be cut back in accordance with details to be submitted and approved to improve the footway width.

Reason: In the interests of pedestrian movement and sustainable travel.

Visibility

No part of the development shall be first occupied, until the visibility splays shown on the approved plan, Drawing No.6221/001 Rev F, have been provided with no obstruction to visibility at or above a height of 600mm above the nearside carriageway level. The visibility splays shall always be maintained free of obstruction thereafter.

Reason: In the interests of highway safety.

Therefore, it is evident that some degree of hedgerow loss within the splays of 2.4m by 120m in each direction is required to facilitate the visibility splays. This has not been quantified by the applicant in terms of total hedgerow loss.

The application form states that the application is considered exempt from BNG provision, as the area affected by the new access is less than 25sqm. However, the total associated loss of hedgerow has not been properly quantified. Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d). In the absence of these details, it is not possible for the LPA to conclude that there would be no net loss of biodiversity on the site as a result of the scheme, or that the BNG national informative requiring submission of a BNG plan would not be required post determination.

The negative visual impact of the loss of the hedgerow on the existing character of the CA has also been expressed by the Conservation Officer.

5. Neighbouring Amenities

Core Policy 57 sets out the general principles for the design of development, including impacts on neighbours. It also states:

vii. Having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing; vibration; and pollution (such as light intrusion, noise, smoke, fumes, effluent, waste or litter).

No objections to the scheme have been received from third parties or neighbours and it is not considered that the proposed access would adversely affect neighbouring amenities in terms of potential disturbance or loss of other amenity. The public protection officer has no observations on the scheme. Therefore, it has been sufficiently demonstrated on the basis of the information provided and subject to conditions that *appropriate levels of amenity are achievable within the development itself*, in accordance with CP57.

6. Planning Balance

The application seeks to provide a new access onto The Portway, from an existing commercial building within the Conservation Area and Principal Employment Area. The

development of an access is acceptable in principle within the settlement boundary for Salisbury.

However, it remains the case that vehicular access between airfield buildings has always been primarily along the internal roads. Maintaining the roadside boundaries without new openings better preserves the sense of distinct character areas between the public highway and the CA. The majority of accesses do not have large visibility splays or require the significant removal of hedgerow. This controlled enclosure of the site reflects its historic military use and gives the area a more clearly defined area than if buildings along the Portway were to have direct accesses. There are no obvious benefits to the CA nor setting of the listed building by the formation of the new opening. The visibility of the buildings is only slightly hampered by unpruned vegetation and the view of the rear courtyard/parking associated with Portway House wouldn't be desirable.

S66 of the 1990 Act requires the LPA to have special regard to the desirability of preserving any listed building and its setting. Section 72 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Great weight should be given to the asset's conservation under the NPPF.

There is no justified need for the new access. The proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the CA and impact on the hierarchy of the CA's administrative buildings, and would fail to enhance or better reveal its significance, contrary to the aims of sections 66 and 72 of the PLBCA Act 1990, the NPPF and CP58. The less than substantial harm identified would not be outweighed by any demonstrable public benefits arising from the provision of the access. This weighs significantly against the proposals in the planning balance as there are only very limited benefits arising from the proposal.

The loss of the hedgerow to the front of the site to provide two new visibility splays has not been quantified. Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d). In the absence of these details, it is not possible for the LPA to conclude that there would be no net loss of biodiversity on the site as a result of the scheme, or that the BNG national informative requiring submission of a BNG plan would not be required post determination. The negative visual impact of the loss of the hedgerow on the existing character of the CA has also been expressed by the Conservation Officer. This weighs further against the proposals.

In conclusion, the proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the CA and impact on the hierarchy of the CA's administrative buildings, contrary to the aims of sections 66 and 72 of the PLBCA Act 1990, the NPPF and CP58. The less than substantial harm identified would not be outweighed by any demonstrable public benefits arising from the provision of the access. The scheme has also not demonstrated that there would not be any net loss or any biodiversity net gain arising from it, contrary to the aims of the NPPF and CP50.

Under para 11 of the NPPF, the application of policies in the Framework that protect areas or assets of particular importance under foot note 7 provides a strong reason for refusing the development proposed and it is considered that any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

RECOMMENDATION: REFUSAL for the following reasons:

The application seeks to provide a new access onto Portway, from an existing commercial building within the Conservation Area and Principal Employment Area. Vehicular access between airfield buildings has historically been primarily along the internal roads. Maintaining the roadside boundaries without new openings has helped preserve the sense of distinct character areas between the public highway and the Conservation Area. The majority of existing accesses do not have large visibility splays or require the significant removal of hedgerow. This controlled enclosure of the site reflects its historic military use and gives the area a more clearly defined area than if buildings along the Portway were to have direct accesses. There are no obvious benefits to the Conservation Area or the setting of the listed building by the formation of the new opening. It would fail to enhance or better reveal the significance of the Conservation Area, contrary to para 219 of the NPPF.

There is no justified or demonstrable need for the new access. The proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the Conservation Area and impact on the hierarchy of the Conservation Area's administrative buildings. The less than substantial harm identified would not be outweighed by any demonstrable public benefits arising from the provision of the access.

The loss of the hedgerow to the front of the site along Portway to provide two new visibility splays has not been quantified. The visibility of the existing buildings is only slightly hampered by the unpruned vegetation and the exposed view of the rear courtyard/parking associated with Portway House wouldn't be desirable. The Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d). In the absence of these details, it is not possible for the LPA to conclude that there would be no net loss of biodiversity on the site as a result of the scheme, or that the BNG national informative requiring submission of a BNG plan would not be required post determination.

The proposal would therefore cause less than substantial harm to the character of the Conservation Area and the setting of the Grade II listed building, which would not be outweighed by any public benefits, contrary to the aims of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF paras 11, 187 (d), 215, 219 and Wiltshire Core Strategy Core Policy 50 and 58.