



**BACKLAND**  
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# **PLANNING STATEMENT**

**Cheviot House, 69-73 Castle Street,  
Salisbury**

for

**Strandhaven Ltd**

2 September 2026

Ref: srs/1006/PS

**BACKLAND & PLANNING LTD**

Kingsway House, 40-41 Foregate Street, Worcester, WR1 1EE

07787 527109

Company number: 14843007

VAT registration: 2242462213



## CONTROL SHEET

Strandhaven Ltd

69-73 Castle Street, Salisbury

### Planning, Design & Access Statement

|        | Name          | Position | Qualifications                                                                              |
|--------|---------------|----------|---------------------------------------------------------------------------------------------|
| Author | Sarah R Smith | Director | BA (Hons), PG Dip Land Resource Planning, PG Dip Urban & Regional Planning, MRTPI, Aff ISEP |

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|              |                 |                  |               |

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## **1. INTRODUCTION**

- 1.1. This Planning Statement has been prepared to support a prior approval submission for the change of use of the first and second floors of Cheviot House, 69-73 Castle Street, Salisbury from office use (Class E) to residential (Class C3) under Schedule 2, Part 3, Class MA of the Town and Country Planning (General permitted Development) (England) Order 2015 (as amended).
- 1.2. The application is accompanied by the following –
  - Cover letter
  - Forms and certificates
  - Existing Site Location Plan
  - Existing and proposed site plan, elevations, floor plans
  - Flood Risk Assessment
  - This Planning Statement
  - CIL forms
  - Application fee of £2,951 paid via the portal (pp-15130492).
- 1.3. The principal purpose of this Statement is to justify the proposal under the Class MA criteria and in planning policy terms and to determine that it is an acceptable development for the Site. In doing this, the Statement contains and explains –
  - A brief site/location description
  - The brief planning history and policy context
  - The proposed development
  - The proposed development against the Class MA criteria - justification
- 1.4. There has been no pre-application consultation with the Council.



## 2. SITE DESCRIPTION

### SITE

- 2.1. The Site is a three-storey office building located on Castle Street in Salisbury. It is a flat roofed, circa 1970's brick and concrete structure with multiple windows to the first and second floors across its façade on Castle Street.



Photo 1: Front Elevation on Castle Street

- 2.2. The ground floor frontage area is occupied by an established Salisbury estate agency, Northwood. To the left of the undercroft parking entrance in the middle of the building is an underutilised lobby area providing access to stairs to the first-floor offices.
- 2.3. The rear of the building can be seen in Photo 2, continuing the same three-storey flat roofed, concrete, brick and multiple glazed structure. The ground level rises slightly to the rear of the building where the car park is located – the building sits at a lower level such that the base of the windows on the rear façade is level with the car park surface.
- 2.4. A further entrance into the building is gained through the doors on the side elevation of the rear wing, providing access to the ground floor and to the upper floors.



Photo 2: Rear of building and parking court

- 2.5. The rear of the parking court is marked by a low brick wall, below and the other side of which is considerable vegetation growth and the River Avon.



Photo 3: Boundary wall with adjacent property and low-rise rear wall in lower left foreground

- 2.6. Further parking, refuse storage and a small sub-station are to be found within the undercroft space, see Photo 4 below.



Photo 4: Undercroft parking and refuse bin storage

## SURROUNDINGS

- 2.7. Castle Street is a mixed commercial and residential street. It is a public highway maintained by Wiltshire County Council. The street has always been a main thoroughfare for travelling to and from places to the north of the city. The Site is towards the southern end of Castle Street, close to the old town centre.
- 2.8 The character of Castle Street today is very varied with a mix of modern blocks of flats and commercial buildings sitting alongside a majority of historic terraced/mews buildings of brick, black and white plaster and painted buildings, generally of either two or three storeys.



Photo 5: View south along Castle Street – property is out of view adjacent to the yellow car



- 2.9 As noted earlier, the Site backs onto a part of the River Avon that is characterised by heavy vegetation and a riverside walk along its western banks to the rear of blocks of residential flats and the Millstream Medical Centre.



Photo 6: Subject property in background with pub garden in front backing onto river



Photo 7: Looking north along river – corner of property visible behind white building on eastern bank



### **3. PLANNING HISTORY AND PLANNING POLICY**

- 3.1. The Wiltshire Council planning applications web site has been interrogated. The following historic application relates specifically to the Site –
- 14/00022/FUL for the retrospective change of use of part of the ground and first floor areas from B1 office use to mixed B1 and D1 uses for Community Outreach Services – granted 27 February 2014
- 3.2. The above application was implemented, and a form of community outreach support services continues to operate out of part of the building today.
- 3.3. There are no other applications on the web site relating to the Site.
- 3.4. Planning permission was granted for the conversion of the adjacent property, no.67 Castle Street, from D1 doctors surgery to C3 residential on 23 December 2013. The officer report at the time noted the following – *‘the proposal includes no provision for off-street parking, however, the application site is within the central area of Salisbury city, within walking distance of shops, services and amenities. By reason of the central sustainable location of the property it is considered no off-street parking should be required to be provided for the development/ The Highway Officer has assessed the proposal and raises no highway objection.’*
- 3.5. Planning permission was also granted for the creation of a covered outdoor dining area on the existing patio at the adjacent Avon Brewery Public House on 3 January 2001 (S/2000/2097).

#### **NATIONAL PLANNING POLICY FRAMEWORK, 2026 (NPPF)**

- 3.6. The NPPF sets out the Government’s planning policies for England and is underpinned by the presumption in favour of sustainable development. In order to achieve sustainable development, three overarching objectives - economic, social, and environmental - would need to be pursued in mutually supportive ways. A balanced assessment against these three dimensions is therefore required.
- 3.7. In terms of decision taking the NPPF advises that local planning authorities should:
- Approve development proposals that accord with the Development Plan without delay, or
  - Where the Development Plan is absent, silent, or relevant policies are out-of-date, grant permission unless:



- (i) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the Framework taken as a whole, or,
- (ii) Specific policies in the Framework indicate development should be restricted.

3.8. The NPPF sets out several underpinning aims which provide the context for the assessment of the Proposed Development.

### **Re-use of land**

3.9. The NPPF promotes the use of previously developed or 'brownfield' land. Policies and decisions should give substantial weight to using suitable brownfield land for identified needs and support development of under-utilised land and buildings.

### **Achieving well-designed places**

3.10 Chapter 13 notes that good design is a key aspect of sustainable development and helps create better places in which to live and work, whilst paragraph 135 sets out several design criteria applicable to new developments. Optimisation of a site's potential to accommodate and sustain an appropriate amount of development should be encouraged.

## **ADOPTED DEVELOPMENT PLAN**

3.12 The adopted Development Plan comprises the following documents –

- Wiltshire Core Strategy, adopted January 2015,
- Salisbury Neighbourhood Plan 2020-2038, made March 2025

3.13 The Site lies within the built-up area of Salisbury but does not have a specific site policy designation. It lies just outside the 'secondary shopping area' and by definition does not form part of the primary shopping frontage. To the west of the Site and the River Avon lies an area of mixed-use (the Maltings and Central Car Park) that is identified as an area for redevelopment for residential, B1 employment and community facilities - see Plan extract over the page.

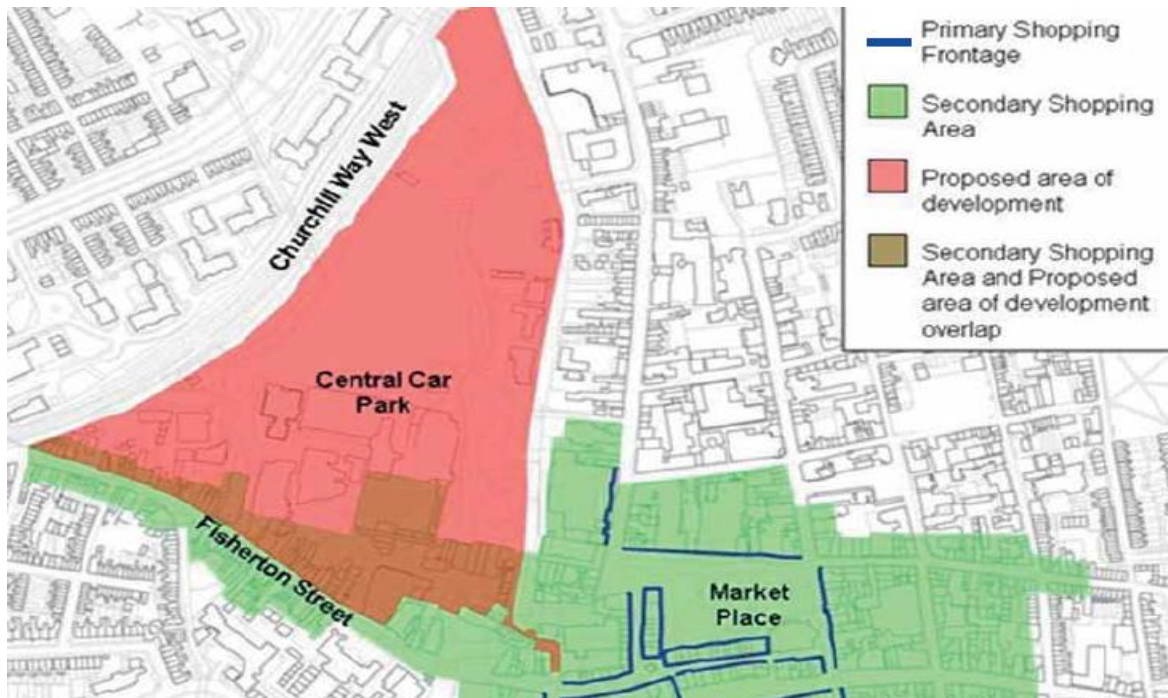


Figure x: Extract from Core Strategy – Site is just to north of green area and east of pink area

- 3.14 The Site is in a conservation area and there are a number of listed buildings in the vicinity, including the adjacent 67 Castle Street. There are no landscape or ecological designations affecting the Site itself, although the River Avon is a designated Special Area of Conservation (SAC). The Site lies within Flood Zones 1, 2 and 3 according to the Environment Agency mapping.
- 3.15 The key aims and policies of the Core Strategy are to support opportunities for the regeneration of brownfield sites in the principal settlements of which Salisbury is one; to provide an appropriate range of dwellings in terms of size and price, from one bedroom apartments to large family homes to meet housing needs; to plan for developments in sustainable locations. As such, Core Strategy policies or relevance to the Site in broad terms are -

- Policy 36 – Brownfield regeneration
- Policy 41 – Sustainable construction
- Policy 45 - Housing
- Policy 58 – Historic environment, conservations areas
- Policies 60/61 - Transport
- Policy 67 – Flood risk
- Policy 69 – Protection of the River Avon SAC



- 3.16 The Site is also located within the Salisbury Central Area Framework boundary, a guidance document published in 2020. Castle Street is identified as one of the nine character areas and suggests that the area should continue in its role of supporting secondary town centre, residential and healthcare uses. This would be achieved through promoting city-centre urban living incorporating a mix of typologies and tenures. The Framework also includes objectives to re-purpose under-utilised upper floors.
- 3.17 The Salisbury Neighbourhood Plan acknowledges the potential for conversions of Class E buildings to residential Class C3 and notes that where the building is located within a Conservation Area, the impact of the conversion should be in keeping with the character and sustainability of the Conservation Area. The Plan also acknowledges that there is a need for homes aimed at younger people who have difficulty in finding properties to rent or buy in the City. Specifically, Policy 16 states that the provision of flats will be supported in sustainable locations.

## **EMERGING LOCAL PLAN**

- 3.18 Wiltshire Council submitted a review plan to the secretary of State in November 2024, with Examination commencing in June 2025. On the 19 May 2026, the Council formally withdrew the review plan following the recommendation of the Inspectors. Any new Local Plan will now be prepared under the new Regulations.

## **SUPPLEMENTARY GUIDANCE/DOCUMENTS**

- 3.19 The latest published Five year Housing Land Supply Statement identifies that as the base date April 2025, Wiltshire Council has a 2.8 years supply of housing.
- 3.20 The Site is not on the Brownfield Register 2022.



## **4. THE DEVELOPMENT PROPOSAL**

4.1. The conversion/change of use of the first and second floors proposes to create a total of eleven apartments, five on the first floor and six on the second. The two existing stairwell cores are retained accessing both floors and a single connecting corridor between the two is to be created, from which the individual flats will be accessed. The connecting corridor allows two points of entry/escape in the event of an emergency, avoiding 'dead-ends'. Appropriate fire doors can be inserted as necessary to comply with building regulations.

4.2. The apartments on the first floor consist of –

- Nos. 1, 2, 4 as one bed, max 2-person apartments with separate living/dining/kitchen area, storage and bathroom, ranging between 50-63sqm
- No. 5 as a two bed, max 4-person apartment with separate living/dining/kitchen area, en-suite, bathroom and storage of 101sqm
- No. 3 as a one bed, max 2-person studio flat with separate bathroom and storage of circa 87.3sqm.

4.3. The apartments on the second floor consist of –

- Nos. 6, 7, 10 as one bed, max 2-person apartments with separate living/dining/kitchen area, storage and bathroom, ranging between 50-63sqm
- Nos. 8 and 9 as one bed 1-person studio flats with separate bathroom and storage, circa 51/52sqm
- No. 11 as a two bed, max 4-person apartment with separate dining/living/kitchen area, storage, en-suite and bathroom, circa 101sqm.

4.4. The ground floor fronting Castle Street is to be retained in its existing use, E class and occupied by the estate agency. Part of the rear building ground floor will be converted into an area for secure communal cycle. A waste storage area is provided outside.

4.5. There are some 18 car parking spaces on the Site to the rear and down the side of the Property. Whilst a number will be retained for use by those using the ground floor premises, the others will be available for residents of the apartments to park should they have a car. On-street parking is also available. Car parking provision for every flat is not necessary given the sustainable town centre location and ease of access to public transport.



4.6. There are no external alterations proposed to the building façade, windows, doors, etc. Any external alterations would be the subject of a separate application as and if necessary, once the principle of the conversion is established. Importantly, the Proposal will seek the re-use of a currently underutilised building, whilst facilitating internal restoration and repair. Such re-use is a low carbon option for delivering housing through a reduced carbon cost in construction.



## **5. PLANNING CONSIDERATIONS**

5.1. This Proposed Development has been carefully assessed against the requirements of Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). We can confirm that the Proposal meets all the necessary criteria:

- The use of the building fell within Class E (commercial, business and service) for a continuous period of at least two years prior to the date of this application for prior approval – indeed parts of the building are still under a tenancy agreement and are being used by an existing occupier,
- The Site is not part of a Site of Special Scientific Interest, a listed building, a scheduled ancient monument, a safety hazard area, or a military explosives storage area,
- The Site is not within a National Landscape, the Broads, a National Park, or a World Heritage Site,
- The Site is not occupied under an agricultural tenancy,
- The Proposed Development is not subject to any Article 4 Direction that would prevent the change of use from Class E to Class C3.

5.2 The application also addresses the specific matters requiring prior approval under paragraph MA.2(2):

- (a) Transport impacts, particularly to ensure safe site access,
- (b) Contamination risks in relation to the building,
- (c) Flooding risk in relation to the building,
- (d) Impacts of noise from commercial premises on the intended occupiers of the Proposed Development,
- (e) Conservation Area location point,
- (f) Provision of adequate natural light in all habitable rooms of the dwellings,
- (g) Impact on intended occupiers of the introduction of residential use in an area of mixed use.

5.3 The matters specified in MA.2(2)(h) are not applicable to this Proposed Development, as it does not involve the loss of services provided by a registered nursery or health centre. With regard to MA.2(2) (i), the fire risk condition, this is also not relevant as the building does not exceed the seven storeys in height criterion.

5.4 There are, in any event, existing means of fire escape serving the first and second floors of the building which will remain available and unaffected through the conversion to residential.



## TRANSPORT AND HIGHWAYS

- 5.5 The NPPF notes that development proposals should only be refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Paragraph W (prior approval) of the General Permitted Development Order requires the local planning authority to consider whether a development proposal would result in a material increase or material change in the character of traffic in the vicinity.
- 5.6 Local Planning policy CP61 advises new development should be located to reduce the need to travel by private car and CP62 advises developments should provide mitigation to offset adverse impact on the local highway network.
- 5.7 Castle Street is in a very sustainable mixed-use location within the town centre, and is a key access road within Salisbury, within easy walking distance of amenities services, transport and employment opportunities. Some private off-road parking is also available on the Site, notwithstanding that the central sustainable location means that car-free occupancy is feasible and achievable here and there is easy access to alternative means of transport within walking distance, these being both bus and train services. In addition, on-street parking is available outside of the property.
- 5.8 Provision is also made for secure cycle parking within the building itself.
- 5.9 Refuse storage is similarly provided within the building. Council refuse vehicles already operate and remove waste from the Site and this arrangement will not later as a result of the conversion/change of use.
- 5.10 Consideration of the Proposed Development identifies that the proposed change of use is not expected to have a significant impact on transport and highways in the area. Indeed, the conversion is likely to actually reduce overall vehicular trips compared to the current office use. There is existing off-site provision for circa 18 vehicles. Even in the event that one space per apartment is required, this would still leave some 7 spaces available for business workers. It is considered unnecessary to provide further additional off-site parking for use by new residents, given its central sustainable location in Salisbury – it already benefits from excellent accessibility with easy access to alternative mean of transport to the private car.
- 5.11 As such, from a highway safety and impact point of view, the Proposed Development is in accordance with national and local planning policy principles.



## **LAND CONTAMINATION**

- 5.12 The NPPF 2026 and local policies all seek to ensure that new development does not result in an adverse impact to public health or wellbeing or significantly add to contamination or pollution.
- 5.13 As the Proposed Development involves only the conversion of an office building to residential accommodation with no additional built form, external alterations, foundations, or breaking of ground, the risk of land contamination is minimal.
- 5.14 No source-pathway-receptor linkages requiring further investigation have been identified. It is anticipated that standard health and safety measures and good practices during any works would be adhered to throughout the development process.

## **FLOOD RISK**

- 5.15 The NPPF and local policy CP67 set out the requirements and constraints for development within Flood Zones – CP67 does not account for conversion of existing buildings that may or may not be in flood zones 2 and 3 as it would appear to principally be concerned with greenfield development. It also references sequential test, which of course is not relevant for a Class MA existing building conversion. That said, the sequential test is already satisfied given the building already exists in an established town centre, ie, the location is fixed, the use is part of wider town centre regeneration and sequential alternatives are not realistic.
- 5.16 The conversion/change of use would be from a 'less vulnerable use' to a 'more vulnerable use' and consequently, and in accordance with the Class MA criteria, a site-specific Flood Risk Assessment has been undertaken, addressing the fact that the Site lies within Flood Zones 1, 2 and 3 being adjacent specifically to the Mill Stream. The River Avon lies further to the west.
- 5.17 It is also noted that the EA, in conjunction with the Council has been actively investing in the Salisbury River Park Scheme, centred around The Maltings and Central Car Park (not least as it is in part allocated for some sort of redevelopment including for housing). A key aim of the Scheme is to reduce flood risk to homes and businesses and enable the regeneration of key sites. Specifically, the Avon is being widened to increase channel capacity and reduce flooding (see extract from the Salisbury River Park web site below).



- 5.18 It is understood that the above scheme is almost complete. The updated flood model data is due some time in 2026 and was requested, but is still unavailable, so the FRA is based on existing data, ie, before the scheme.
- 5.19 In terms of surface water drainage provision, evidence of discharge method, rates and volumes and betterment of current discharge rates, the existing and therefore the proposed surface water drainage provision falls outside of the scope of assessment for this prior approval application.
- 5.20 There is no record of any historic flooding at the Property according to the EA historic maps, or along the proposed escape route or immediate surrounds of Castle Street.
- 5.21 In terms of surface water drainage provision, evidence of discharge method , rates and volumes and betterment of current discharge rates, the existing and therefore the proposed surface water drainage provision falls outside of the scope of the assessment for this prior approval application. Notwithstanding, no additional impermeable areas will be created by the Proposed Development. There is no change to existing development footprint, no change to ground floor permeability, no displacement of flood water and no alteration to flow paths. Consequently, there will be no change to the existing surface water drainage arrangement in any event.



- 5.22 The Proposed Development will replace commercial use with residential accommodation for a maximum of 23 people (considerably fewer than could be in the building were the floors fully occupied with commercial personnel. The Proposed Development will not materially increase peak flows and not create any changes in the flow path for sewer and drainage water.
- 5.23 The risk to the Proposed Development is low from all sources of flooding given that it is concerned with the first and second floor occupation, albeit it is acknowledged that the egress/access to this is via the ground floor entrances to the rear and front of the Property, which are potentially likely to be impacted.
- 5.2 The Proposed Development is not considered to increase the flood risk off-site, nor to the Site itself. The Proposal is concerned with the residential use of the building from first floor and above (ie, not the ground floor). Residential accommodation is NOT being introduced at ground floor level – exposure is reduced, not increased. The Proposal is likely to be capable of being flood resilient and provide safe access and egress routes for future residents in time of flooding for its life time.
- 5.3 It is also considered that formal mitigation measures are not necessary. The Proposed Development is for studio/one bed apartments for the most part, likely to be attractive to single occupancy or a young couples – and unlikely to be occupied by the most vulnerable, i.e., children and elderly. Notwithstanding that, a Flood Warning and Evacuation Plan or Flood Emergency Management Plan setting out roles/responsibilities, the EA flood warning process and service, evacuation procedures and a safe evacuation route is proposed.
- 5.4 In broad terms this entails preparation of an information pack for the new residents which includes –
- Details of the EA Flood Warning Direct Service – flood warnings via text, telephone or email to inform residents of flooding risk – which residents and the landlord can and should register for free of charge. The EA's target warning time is two hours, so the occupants would have this time minimise risk and to evacuate to a safe area,
  - Actions to take to prepare for flooding,
  - Details of the EA 24-hour flood information service and web-site,
  - Details of the Emergency Site Access/Egress Route – from the ground floor front door exiting directly onto Castle Street, crossing over Castle Street (identified as the extent of Flood Zone 2/3 approximately 5m away), turning north, then east down the alley adjacent to the Monument Place retirement flats, ultimately leading to Endless Street which is a maximum total of 115m away and located well within Flood Zone 1 – this is the most obvious and



quick direct route towards higher ground of Flood Zone 1, i.e., beyond the maximum extent of flooding (see Figure 2.2 of the FRA).

5.5 It is noted that a number of similar application for residential development/conversion have been approved along Castle Street and other parts of Salisbury that lie within Flood Zones 2 and /or 3. The Applicant is prepared to accept a condition on the prior approval in respect of the provision of a Flood Warning, Evacuation and Emergency Plan being submitted (if deemed necessary over and above the information provided within this application) that should be implemented and regularly reviewed.

5.6 In summary, conversion of existing upper floors is acceptable because –

- Flood zone 2 is medium risk, not high risk,
- Residential use is ‘more vulnerable’, which is permitted in Flood Zone 2 subject to an FRA, which has been provided,
- There is safe refuge within the building,
- Safe access/egress to higher ground has been demonstrated,
- There is a clear evacuation plan,
- The development does not increase flood risk elsewhere and does not place new dwellings at ground floor level.

## **NOISE**

5.26 The character of its immediate surroundings is mixed use, including a number of residential conversions and new residential builds (particularly as elderly accommodation) along the length of Castle Street. The adjacent property to the south is in residential use. The adjacent property to the north appears to be in commercial use as a small pub - it also has a small garden/smoking area to the rear backing onto the river and shielded from view from the rear of the Application Property by vegetation and trees. The pub is open between 1200 and 2300 like most pubs; its neighbour to the other side is also a residential property.

5.27 If it is considered that noise from the pub may cause disturbance to the intended occupants of the rear two apartments in particular, the Applicant would accept a condition that could reasonably be imposed in relation to the provision of standard double glazing and trickle vents within the windows.

## **CONSERVATION AREA IMPACT**

5.28 The Property lies within the Conservation Area. No.67 adjacent is a grade II listed building that itself has had a grant of planning permission (in 2014) to convert to



residential from D1 doctors surgery. That application was judged to be unlikely to have an adverse impact on the existing character of the surrounding Conservation Area.

- 5.29 In terms of the Proposed Development, there are no external alterations proposed to the existing building; the proposed use is residential with the street frontage ground floor use remaining in use class E. It is considered, just like the neighbouring building, that there is unlikely to be an adverse impact on the existing character and appearance of the Conservation Area.

### **NATURAL LIGHT IN ALL HABITABLE ROOMS**

- 5.30 Both the frontage and the rear elements of the building are characterised by the presence of many windows in the elevations. The internal layout of the rear part of the building allows for a single internal core service corridor or landing along the shared wall with the adjacent Property, providing access to each of the individual apartments. This allows the apartments to be configured to make use of the existing windows and therefore maximum natural light penetration to all habitable rooms as required by design standards. Similarly, the Castle Street frontage building contains 11 windows on each floor enabling it to be configured into two apartments per floor with natural light to both the lounge/diner/kitchen area and the bedroom.

### **SPACE STANDARDS**

- 5.31 Paragraph 9A Section 3 of the Introductory Text in the Town and Country Planning (General Permitted Development (England)) Order 2015 states that – (9A) Schedule 2 does not grant permission for, or authorise any development of, any new dwelling house – (a) where the gross internal floor area is less than 37sqm in size; or (b) that does not comply with the nationally described space standard issued by the Department for Communities and Local Government on 27<sup>th</sup> March 2015.
- 5.32 The submitted plans define the internal space standards of each of the proposed residential dwellings and show that none of them would measure less than the minimum gross internal floor area size of 37sqm – indeed, each of the one bed dwellings measures at least 50sqm which is the requirement if occupied by two people, and the two bed dwellings measure at least 70sqm which is the requirement if occupied by 4 people. As such, the Proposed Development complies with the nationally described space standards.



## **OTHER CONSIDERATIONS**

5.33 Whilst it is acknowledged that a Class MA prior approval application should only be determined in accordance with/against the specific criteria set out above, for completeness, we set out other matters that would ordinarily be considered for this Proposal had it been submitted as a full change of use application.

### **Principle of Development**

5.34 The key consideration in terms of the principle of development is whether the proposed use/conversion is acceptable in this location in planning terms.

5.35 The main thrust of national and local policy lends support in principle to delivering new residential development in sustainable locations, making efficient and effective use of land and buildings and prioritising the redevelopment of brownfield sites ahead of greenfield sites.

5.36 The Site is within the development boundary for Salisbury which seeks to support residential and other development subject to site specific constraints being identified. As one of the main towns within the District, Salisbury is the focus for locating and range of different types of residential development, to meet the full range of the community's housing needs. As well as the above, Policy CP45 also stress the prioritising of provision of a range of types and sizes of dwellings, with CP2 identifying that around 35% of new housing to take place on previously developed land – the conversion of this underutilised building would assist in meeting that target.

5.37 It is also noted that the Central Car Park area in Salisbury, located on the opposite side of the river to the Application Property (and lying within Flood Zone 2/3) is identified for redevelopment to include circa 200 dwellings; if this location on one side of the river is considered acceptable to locate and develop for residential purposes (notably from a flood risk point of view), then conversion of the first and second floor of an existing building on the other side equally is acceptable.

5.38 The Site's location within the very heart of the town centre, is wholly and undisputably sustainable and accords with all national and local policies in this regard.



## **Housing Need and Mix**

- 5.39 There is a shortfall of smaller sized accommodation in Salisbury according to the most recent, albeit, now dated Housing and Economic Needs Assessment, particularly 1 bed accommodation. The four studios being provided within the town centre would necessarily be attractive to younger, single people seeing a first home to rent/buy or a young professional.
- 5.40 Furthermore, and noting that the conversion to residential is acceptable in principle in any event, as a result of its town centre location, the Council is unable to demonstrate a five-year housing land supply as required by the NPPF. This currently stands at a mere 2.8 years according to the latest published statement with base date of April 2025. Eleven apartments/studios would make a small but nevertheless, important contributions reducing both the overall shortfall and that relating to 1 bed accommodation.

## **Town Centre Regeneration**

- 5.41 It is unfortunately clear that the town centre is suffering decline for a variety of reasons, not least changing shopping habits, rising costs, etc. There are a considerable number of vacant properties within the town centre and along Castle Street, notwithstanding the level of redevelopment that has already taken place with schemes like the Castle Gate (Monument Place) elderly flat scheme opposite the Application Site.
- 5.42 Revitalising high streets and town centres is a major priority for the Council with key aims being to support regeneration projects to deliver the vision and to tackle the impact of vacant units. Bringing life back into the town centre can be achieved through the introduction of residential occupation on upper floors of properties which provide a valuable source of much needed homes.
- 5.43 Whilst it is acknowledged that that flooding matters are an important consideration, the town centre of Salisbury has been a place where people have lived and worked for hundreds of years. Blanket restrictions and refusals against the re-use of upper floors for residential use within Salisbury or the hundreds of existing towns/city centres based on the 'possibility' of flooding essentially condemns such locations to further deterioration and ultimately increases the need to find more development on greenfield sites – Regeneration and re-use of existing land and buildings, especially within existing built-up/town centre areas is the first priority in sustainable development principles as set out in national and local planning policies.



5.44 A pragmatic and balanced approach needs to be taken to make the most of this considerable under-used source of sustainable development opportunity. Salisbury does have flood defences, and as already referenced in the Flood Risk section, the Riverside Park Scheme is specifically designed to widen the River Avon and reduce potential flooding to properties.



## **6. CONCLUSIONS**

- 6.1. The Proposed Development complies with all the relevant requirements of Class MA and will not result in any adverse impacts that would warrant a refusal of prior approval.
- 6.2. It will assist in meeting the Salisbury (and the wider Wiltshire) housing need, providing accommodation for single people which, according to the latest Housing Needs information, is desperately needed.
- 6.3. As set out in paragraph 5.28 of this Statement, conversion of existing upper floors is acceptable because –
  - Flood zone 2 is medium risk, not high risk,
  - Residential use is ‘more vulnerable’, which is permitted in Flood Zone 2 subject to an FRA, which has been provided,
  - Safe access/egress to higher ground has been demonstrated,
  - The development does not increase flood risk elsewhere and does not place new dwellings at ground floor level.
- 6.4. Existing and established town centres built along rivers ALWAYS fall partly within Flood Zone 2. If Council’s continually refuse all residential re-use of upper floors in particular, town centres will continue to decline, vacant buildings will continue to deteriorate, anti-social behaviour could increase, housing supply suffers and sustainability objectives are undermined.
- 6.5. The Proposal represents sustainable development in every sense of the word –
  - re-uses an existing building within a town centre,
  - reduces town centre vacancy,
  - supports regeneration and aligns with the NPPF’s ‘town centre first’ and brownfield first’ principles,
  - increases footfall and improves natural surveillance,
  - is within easy walking and cycling distance to the railway station’
  - has easy access to bus stops, shops and services, as well as
  - provides (albeit necessarily limited) access for private cars to park, and
  - helps reduce pressure to build on greenfield land.
- 6.6. The Proposal is exactly the type of sustainable re-use and development that the NPPF encourages and says should be supported – it accords with the relevant



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NPPF and local planning policies, and the requirements of Class MA, and it is therefore respectfully requested that prior approval be granted.