HERITAGE IMPACT ASSESSMENT

In respect of:

RESTORATION, REPAIRS AND ALTERATIONS

At:

TRAFALGAR PARK, STANDLYNCH, DOWNTON, SP5 3QG

On behalf of:

Mr B & Mrs S Jones

August 2023



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1.0 Introduction

1.1 Trafalgar Park is a Grade I listed country house with a central 'villa' constructed in the early 18th century to designs by John James, extended with flanking pavilions by John Wood the Younger and with a portico and interventions by Nicholas Revett in the late 18th century, and with external balustrading around the exterior added by William Butterfield in the 19th century.

1.2 The house and its ancillary buildings, many of which are separately listed at Grade II, create a good ensemble of historic country house structures. The parkland, itself Grade II listed, contributes to the overall significance of the house and the group.

1.3 This report accompanies applications for planning permission and listed building consent for restoration, repairs and alterations to the house. It supplements the Design & Access Statement submitted with the applications by Affinity Architects (the DAS).

1.4 What follows describes the impact of the proposals on the heritage asset and its setting to fulfil the requirements of the National Planning Policy Framework (NPPF, revised July 2021), and to meet the council's local validation checklist for applications affecting heritage assets.

1.5 A Heritage Assessment was produced for the site (Elaine Milton Heritage & Planning, June 2021), and this was used to inform the application proposals. That document should be read in conjunction with the current report.

1.6 The Assessment concluded that Trafalgar Park is a highly important Grade I listed country house of Classical layout and proportions and of exceptional significance for its architectural, historic, associational and evidential values.

1.7 Pre-application enquiries were made to the Council (reference ENQ/2022/00451)) and Historic England (reference PA01175905). The Council's Senior Conservation and Planning Officer made the following comments in the response letter dated 4 May 2022 insofar as they relate to the current application:

Roof Works

- The proposals are generally positive and to be welcomed
- The installation of a new flat roof over the central roof well gives rise to reservations and would require clear justification

1.8 Historic England's Principal Inspector of Historic Buildings and Areas made the comments on the pre-application enquiry in a letter dated 14 April 2022, but did not remark on the alterations to the roof or other external works:

1.9 Listed building consent was obtained on 13 December 2022 for the repair and comprehensive refurbishment of the whole building under application reference PL/2022/06321. The current submission relates to those items previously consented that require planning permission, plus minor modifications to the listed building consent. As such, this report includes much of the material from the Heritage Impact Assessment dated August 2022 but omits the items for which listed building consent only was needed and has already been approved.

1.10 There are 4 amendments to the original scheme resulting in the need for a fresh application for listed building consent, namely:

- The proposed central mansard roof over the mansion house is to be covered in sandcast lead rather than single-ply membrane
- The 4no. replacement cast iron rainwater downpipes on the mansion house element are to be enlarged from 4" diameter pipes to 6" diameter ones to cope with a predicted increase in rainfall due to climate change
- The randomly placed chimney pots are to be removed from the mansion house chimneys to restore the original profile of the stacks
- The position of the soil vent pipes is to be modified following finalisation of the drainage scheme for the house.

2.0 Proposals

2.1 The objectives of the current proposals are described within the accompanying DAS produced by Affinity Architects. For the purposes of the DAS, the proposals have been grouped into three categories: Reinstatement of the original 18th century house; fabric and environmental improvements; and accessibility and lifestyle improvements. It is explained that the current proposals form the first stage of phased programme of works to restore, repair and alter the house to achieve the objectives.

2.2 The current application proposals are summarised below.

North Gallery Roof

To re-cover the roof in lead on an amended construction The new roof will have central roll ridge and bays falling to both sides of the gallery. The valleys will be formed with appropriate steps giving subsequently marginally deeper gutters. Lead flashings will be dressed up the inner face of the parapet wall and under the repaired and repointed coping stones. All leadwork will follow traditional detailing and Lead Sheet Association (LSA) best practice. A new rainwater outlet will be installed on the west side, matching that on the east. Existing vents on the elevations will be retained and re-shrouded, maintaining ventilation to below the lead. Hygroscopic insulation batts (hemp/wood fibre) will be installed within the new ceiling to improve thermal performance.



North Gallery roof

Central Block Roof

A new shallow pitched 'deck' will be formed just marginally above level of the existing ridges, to create a virtually flat hipped 'mansard' infill across the entire well and drain at all edges down onto the existing external slopes. This will be constructed with timber rafters supported on a framework of steels which would be supported off masonry construction thus creating no additional weight on the existing roof structure.

The deck will be covered with sandcast lead, Code 8, with a single step over the spans to allow for minimal falls dressing over and onto the lead ridges, blending with the original roofline. A low lying, flush glazed rooflight in the top of flat area would retain light into the attic space below. The 'mansard' infill will be virtually invisible from anywhere but the air and would drain directly over the external roof pitches to existing parapet gutters. The existing drainage channels would be retained in situ, to serve as a record of the past, but no longer serve to take rainwater away and risk ingress through the attic ceilings. Inappropriate coverings to the inner pitches and well would be removed, but roof structure and sarking boards would all be retained in situ. Further development of the design in conjunction with the structural engineering team SFK Consulting has resulted in a proposed solution that sees the steel beams supported principally off the chimney stacks. Steels would form a level grid that would be used to support the shallow sloping timber roof structure forming the 'flat' mansard.



Central Block roof

South Gallery Roof

The felt on the smaller stairwell roof will be stripped and a new substrate installed to take a new single ply covering in lead grey. On the gallery roof, single ply covering will be adhered to insulation laid which over the gallery roof will be laid over the existing felt covering. The single ply will be turned up 150mm above finished roof level at the perimeter, with lead flashings covering the upstand. The new covering will be suitably dressed into the existing rainwater outlets that will remain unchanged.



South Gallery roof

Maintenance Access

The two existing rooflights on the South Pavilion would be removed. Three 'Stella' conservation rooflights (allowing emergency egress) would be installed, low-lying within the slate roof pitches of the main roof, South Pavilion and North Pavilion. The rooflights would be low down in the slope, close to the parapets, which will largely conceal them from view.

Maintenance Safety

An installation in the form of a 'fall restraint' that would provide security for those clearing out gutters. This would come in the form of a running line/cable, into which people can secure themselves through a lanyard fixed to a safety harness (see illustration right). The position of the fixings would be to avoid the system being visible from the ground, concealed behind the parapet walls. In finalising the end

design, care will be taken to ensure that there is no visual impact on the building externally, from the ground. This may mean the system cannot reach higher areas of the roof, but access to those elements would be carried out by trade professionals, more conversant with managing the risks of working at height.

Lightning Protection

Installation of lightning protection system to the building including conductor rods, tapes and down conductors. The system will be designed to be as unobtrusive as possible, using coloured tapes for camouflage and fixing down the tapes behind existing rainwater downpipes so as to be as concealed as possible.

Weathering Protection

Complete the installation of lead shrouds around the building for weathering protection.

Sanitation Improvements

Installing new foul waste pipes and new below-ground drainage for all the sanitation provision, removing 'black water' from the rainwater system. New soil vent pipes on the face of the building that will be in cast iron fitted neatly on the 'sacrificial' building elevations facing north and south. Wherever possible, drainage runs will be reconfigured to remove external branch waste connections from view, connecting into the rear of the new cast iron soil pipes. Reconfigure below ground layout with new manholes in the courtyards to take foul waste. Install a new sewage treatment plant to the north-west of the building to take all the foul waste, allowing suitable falls.

3.0 Policy

Primary Legislation

3.1 Statutory duties exist under **sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990** ('the Act') for the local planning authority in considering whether to grant listed building consent or planning permission for development that affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Development Plan Policies

3.2 The statutory duties are reflected in the **Wiltshire Core Strategy** (WCS), which was adopted by Wiltshire Council on 20 January 2015. **Core Policy 57** of the WCS seeks to ensure high quality design and place shaping. **Core Policy 58** of the WCS seeks to promote the conservation and, where possible, enhancement of the county's historic environment.

National Policy Advice

3.3 National planning policy relating to the historic environment is provided within **section 16 of the NPPF (revised July 2021)**. It advises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.

3.4 Paragraph 199 of the NPPF advises 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. 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. Any harm or loss to a heritage asset's significance should require clear and convincing justification and needs to be weighed against identifiable public benefits. Substantial harm or loss of a Grade II listed building should be exceptional.

3.5 Paragraph 201 of the NPPF advises where proposals would lead to substantial harm to the significance of a designated heritage asset, the proposals should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of four listed criteria therein apply.

3.6 Paragraph 202 advises that where proposals would lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposals, including, where appropriate, securing its optimum viable use.

3.7 Paragraph 206 of the NPPF advises that local planning authorities should look for opportunities for new development within conservation areas or the setting of heritage assets to enhance or better reveal their significance.

National Guidance

3.8 It is advisable that proposals for repair, restoration and alteration should follow the guidance within the ***Historic England Advice Note 2: Making Changes to Heritage Assets*** (HEAN2, February 2016). The document acknowledges (paragraph 3) that the best way to conserve a building is to keep it in use, and that a *'reasonable and proportionate approach to owner's needs is therefore essential'*.

3.9 As a general principle for adaptation, HEAN2 advises as much of the historic fabric and plan form that contributes to the significance of a heritage asset should be retained as possible, with new work ideally being reversible. Harm to significance may be justified on grounds of overriding public benefit that may accrue including maintaining the building in its optimum viable use.

3.10 Section 1 of HEAN2 advises that repairs should follow good conservation practice and consideration should be given to: the loss of historic fabric being minimised and proportionate to the nature of the works; original materials only being replaced where they have failed in their purpose or are beyond economic repair; repairs carried out using materials to match the original in substance, texture, quality and colour; and the use of sympathetic and traditional methods of repair.

3.11 Section 2 of HEAN2 advises that restoration works are those that reveal or recover something of significance that has been eroded, obscured or previously removed. It says, where it is proposed to remove more modern coverings and finishes that are harmful to the significance or the integrity of the building, appropriate materials should be introduced in their place.

3.12 HEAN2 also advises that some of the issues to consider in respect of new additions are proportion, height, massing, bulk, materials and setting, and that new work should not dominate the existing in terms of scale, material or siting. The guidance advises that an assessment of the asset's significance will usually suggest an appropriate form of any extension.

4.0 Heritage Impact Assessment

4.1 The impacts of the current application proposals are explained within the Heritage Impact Assessment table in the Appendix to this report.

4.2 The impacts of the amended items requiring a fresh application for listed building consent are described below.

Amended Covering to New Mansard Roof

4.3 As stated for the previous application for listed building consent, the justification for the proposed mansard roof is that it would address the damage caused by the rainwater discharge, which uses an internal drainage system, and associated water damage and the structural defects identified in the structural engineer's report (see pp14 & 15 of the DAS). The new roof would divert the rainwater to the exterior, using the existing rainwater goods, thus alleviating the damp and preventing further damage to the highly important Entrance Hall ceiling. Although the proposed roof would be of a non-traditional mansard shape and would alter the profile of the original roof, the visual impact would be limited due to being largely unseen from ground level. The roof would be covered in Code 8 lead rather than the previously approved single-ply membrane. The profile of the lead roof would marginally higher than in single-ply, but would be a more appropriate roof covering. It is worth noting the inner slopes of the roof are currently covered in non-original concrete tiles. The design is such that historic roof structure and fabric would not be lost, with the new roof 'resting' on the old one, and the light-touch approach means that in theory the original roof form could be reinstated. Spin-off benefits would be enhanced natural light/lower energy consumption and improved insulation for the house. The 'sacrificial' benefits of the proposals would outweigh the harm to the profile of the roof.

Enlargement of 4No. Cast Iron Downpipes

4.4 The 4no. cast iron downpipes proposed for replacement would be enlarged from 4" to 6" diameter to cope with a rise in predicted rainfall. The proposals would result in a minor increase and have a negligible impact on the appearance of the building. The enlarged downpipes would better preserve the fabric of the building.

Removal of Chimney Pots

4.5 The chimney pots on the main part of the house are later additions and are randomly placed. Removing the pots would restore the original profiles of the chimney stacks and the silhouette of the house.

Sanitary Improvements & Repositioning of the Soil Vent Pipes

4.6 The position of the soil vent pipes has been reviewed following development of the sanitary improvements and drainage strategy for the house. The revised positioning would remain discreet and would be fewer in number than originally proposed, resulting in an overall improvement on the approved scheme.

5.0 Conclusion

5.1 Trafalgar Park is a highly significant Grade I listed country house that was constructed in the early 18th century to designs by John James and was, in the late 18th century, extended by John Wood the Younger and added to by Nicholas Revett.

5.2 The recent Heritage Assessment for the house identified that the special interest of the heritage asset derives from its impressive scale, plan form, wealth of 18th century features, architectural achievement and association with notable historical figures.

5.3 The current proposals form part of a first phase of an ambitious plan by the new owners to restore the house to its former glory and make it suitable for modern family living, objectives that should be welcomed after years of underinvestment and given the potential for alternative, harmful uses resulting from previous planning approvals.

5.4 The proposals have been informed by detailed research and analysis and considering the feedback from pre-application enquiries to Historic England and the local planning authority.

5.5 As can be seen from the Heritage Impact Assessment summary above and the table in the appendix of the report, most of the proposed works would be minor in scale and nature resulting in negligible or no harm or indeed benefits to the heritage asset.

APPENDIX 1: HERITAGE IMPACT ASSESSMENT TABLE

Item	Summary of proposed works	Significance affected	Impact of works on significance	Justification (including potential benefits)	Mitigation measures proposed
North Gallery roof	New roof construction with lead covering	Flat lead roof over the late C18 John Wood the Younger addition; possibly original joists but replacement lead and patchwork of materials	• Potential loss of historic joists • Minor change to the profile of the roof but low visual impact due to the location of the roof and presence of the parapet	• Current configuration and roof covering are causing water ingress and harm to the building fabric • Proposals would stem the water ingress and the amended roof design would better protect the building fabric • More appropriate and unified roof covering • Proposals would include for improved rainwater discharge for the long-term protection of fabric	
Central Block roof	New mansard roof including skylight over main roof well	Main roof of early C18 villa	• No loss of historic fabric (roof structure retained underneath new roof, concrete tiles only removed, existing drainage channels retained) • Minimal impact from structural steel frame supported by the chimney	• Weight would be removed from partition walls, reducing the risk of further damage to the Entrance Hall ceiling • Improvements to the rainwater discharge by diverting it away from the interior of the building • Would enable improved	The new roof would have a 'light-touch' impact on the building fabric and would be reversible

Item	Summary of proposed works	Significance affected	Impact of works on significance	Justification (including potential benefits)	Mitigation measures proposed
			stacks • Change to the profile of the original roof • Appropriate and traditional materials • Low visual impact due to limited views • No additional external drainage pipework required for the new roof	insulation for the house • Would provide natural light via the skylight and reduced energy consumption	
South Gallery roof	Recovering of modern felt roof with grey single-ply membrane and lead flashings	Replacement roof of late C18 South Gallery	• No loss of historic fabric • Minimal visual impact due to location and presence of the parapet (not visible from the 'main villa' or the ground)	• Would provide an economical repair on an essentially like-for-like basis • Avoids the need for extensive rebuilding • Would provide improved weather protection in the interests of building preservation	The grey coloured single-ply would mimic the appearance of lead
Main roof and pavilion roofs	Existing rooflights removed from South Pavilion; installation of a conservation rooflight in the	Historic slate roofs of the house	• Loss of three small areas of natural slate roofing (rafters retained) • Low visual impact due to positioning and presence of the parapets	• Would provide safe access to maintain the roofs in the interest of building preservation • The existing unsympathetic rooflights would be	The chosen 'Stella' conservation rooflight would have a traditional appearance, be of modest size and

Item	Summary of proposed works	Significance affected	Impact of works on significance	Justification (including potential benefits)	Mitigation measures proposed
	slate roofs of the main villa and each pavilion (3 in total)			removed	have minimal visual impact
Main roof and pavilion roofs	Fixings to the lower sections of the roofs to allow for a 'fall restraint' system	Roof of the early C18 house and late C18 pavilions	• There would be minimal fixing to the roof by insertion between the rafters • Low visual impact due to discreet positioning behind the parapets	• Would provide safer access to maintain the roofs in the interest of building preservation	
Main roof and pavilion roofs	Installation of conductor rods, tapes and down conductors for lightning protection	Roof of the early C18 house and late C18 pavilions	• Minimal visual impact due to discreet positioning and modest interventions	• Protection to the building from lightning	Installations would be camouflaged minimise their visual impact
Stone cornices below the parapets	Installation of lead dressings to the tops of the cornices where missing or not already in place	Original stone cornices – historic and architectural significance	• Limited visual impact due to the location of the lead dressings and the proposed detailing	• Would provide better protection to the stone cornices and prevent further damage to the building fabric	
Exterior of the house	Cleaning to remove staining	Historic brick walls	• Low impact on fabric due to the use of the tried-	• Improved external appearance of the building	

Item	Summary of proposed works	Significance affected	Impact of works on significance	Justification (including potential benefits)	Mitigation measures proposed
	from the brickwork		and-tested 'Doff' process	from removal of staining and mottling of brickwork	
Drainage systems in and around the house	Installation of new cast iron foul waste pipes and below-ground drainage	Exterior and setting of the house	• Minimal visual impact due to modest scale of proposals and the use of sympathetic materials	• Upgrades the sanitation provision of the house • Reduction in the potential for overflowing foul drains and therefore better protection for the house • Enables compliance with current Building Regulations	