Wiltshire Council Planning Consultation Response

3 October 2023

Officer's Name: Becky Jones
Officer's Title: Senior Planning Officer

Jocelyn Sage
Senior Conservation Officer
Wiltshire Council Conservation (South and West - part)

Application No: **PL/2023/08338**
LBC Restoration, Repairs and Alterations
Trafalgar Park, Witherington Road, Downton, Salisbury, SP5 3QR

Please find following comments in respect of the above application(s).

Recommendations:

	No comment
	Support in principle subject to amendments to the scheme (as set out below)
x	Support subject to conditions (as set out below)
	Object (for reasons set out below)
	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 201-3 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 197 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance." It is also required that distinctive elements of Wiltshire's historic

environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered:

Trafalgar is a grade I listed building of outstanding national significance. It sits within a registered park and garden and associated with the house, are a number of separately listed buildings and structures, including the grade II* listed Standlynch Chapel.

The house has been in continuous residential use and changed hands recently. The new purchaser is undertaking a comprehensive programme of repairs and restoration (including the almost derelict north pavilion) as well as upgrading facilities to 'future proof' the building. In view of the grade and its interest, Historic England have been involved.

Proposal:

Works have commenced on site and various approvals obtained. The covering letter from Tony Allen (dated 20/9/2023) sets out all the relevant consents submitted by the new owner.

The current application seeks to acquire consent for changes to the original (approved) scheme. The changes are:

- The mansard roof to be covered in lead rather than single ply;
- An increase in the diameter of the cast iron rainwater pipes for the house;
- Removal of the chimney pots (not chimney stacks);
- Modifications to the soil vent pipes.

Information considered/provided: Paragraph 194 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting.

The initial applications for proposals in respect of Trafalgar House were accompanied by a comprehensive heritage statement by Elaine Milton. The current application is provided with a Heritage Impact Assessment (dated August 2023).

Paragraph 195 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Assessment:

The proposals for significant areas of work, such as the reconfiguring of the roof to the house, have been the subject of previous applications. The current application is wholly to do with detailed elements.

Referring to the works elements contained within the HIA (on:

Central block roof (new mansard roof)
Originally to be covered in ply (as approved), lead is now proposed. This would be an enhancement ie a traditional quality material.

Maintenance access
It is always a good idea to incorporate access into schemes for 'future proofing'. The proposal is for 3 new rooflights in the south pavilion, main roof and north pavilion. Three would be removed from the south pavilion. The RLs would be low on the roof, largely behind the parapets and so not visually prominent.

Enlargement of 4 cast iron downpipes
Required to achieve more efficient water disposal as a result of heavier rainfall (or flash flooding). This would be in the interests of the health of the building.

Removal of chimney pots
These are later additions and of an inconsistent pattern, They do not contribute to the interest of the house..

Sanitation improvement installation of new soil vent pipes on the face of the building.
These will be cast iron and fitted on what the heritage consultant describes as '*sacrificial building elevations facing north and south'*. I would agree that these are the least visually prominent/significant elevations and as such, would seem to be the appropriate location for this not entirely attractive but inevitable necessity.

Summary & conclusion:

Section 66 of the **Planning (LBCA) Act 1990** requires that *'development which affects a listed building or its setting, the local planning authority ……..shall 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*.'

The works are of a minor nature which are required in order to provide greater, longer-lasting benefits to this very significant heritage asset. In the totality of the scheme, namely the comprehensive refurbishment and rehabilitation of this house, the proposals would have no adverse impact on the special interest of the building. As such, the proposals are considered to be in accordance with Section 66 of the Act, core policy 58 and chapter 16 of the NPPF.

I don't propose any conditions.