PLANNING STATEMENT

FORMER PIGGERY, TRAFALGAR GARDENS, STANDLYNCH, SALISBURY, SP5 3QQ

MS M BATTERS

JANUARY 2024



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

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

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by RAW Planning Ltd to accompany a Section 73 application to vary planning permission ref: PL/2022/01331 for demolition of former piggery and its replacement with 2 no. holiday lets together with car parking, amenity space, landscaping and associated works at Trafalgar Gardens, Standlynch, SP5 3QQ ("the Application Site"). The application is submitted on behalf of Ms M Batters ("The Applicant").

1.2 The focus of the application is to flip the floorplans of each holiday let so that they each have their own kitchen / living on an outer wall with improved access to the garden and revisions to the approved fenestration.

1.3 Planning permission ref: PL/2022/01331 was approved on 8th December 2022. A separate planning application was approved in April 2022 for a single storey extension to the west (side) of the neighbouring cottage.

1.4 This Planning Statement is an amended version of that submitted in support of the original application and provides a summary overview of the application proposals (as amended) as well as identifying the Planning Policy Framework within which it should normally be considered.

1.5 Section 2 provides a description of the application site and the surrounding area. Section 3 sets out the development proposals. The Planning Policy Framework that is applicable to the application is provided in Section 4. Section 5 provides a reasoned justification for the development being proposed and Section 6 sets out a summary and conclusions.

2. THE APPLICATION SITE AND SURROUNDINGS

2.1 The application site forms part of the former Kitchen Garden of Trafalgar House which is located within Trafalgar Gardens; a Registered Park and Garden. Trafalgar Gardens lies approximately 1500m north of the village of Downton and approximately 7 miles south east of Salisbury.

2.2 The former piggery building subject of this application is located at the north east corner of the former Kitchen Garden. The building is constructed of a low level block work wall and mono pitched corrugated iron roof which adjoins the walled garden. The accompanying Heritage Assessment states that the former piggery is a recent structure that was built for a previous tenant farmer, who predominantly farmed pigs within the walled garden but also turkeys. Most recently the pig shed was used for breeding Cairn terriers.

2.3 The building has a trapezium footprint and is between 16m and 18m wide (east – west) and 11m deep (north – south). The building is 1.3m to the eaves along the south elevation and circa 4m to the ridge to the north where the building adjoins the walled garden.

2.4 The photos below show the existing condition of the building.



Photo 1: Former Piggery Building (east elevation)



Photo 2: Former piggery building (south elevation)

2.5 To the south of the piggery is a cottage constructed in the 19th century as a gardener's cottage for the Estate. The piggery sits within the northern part of the cottages northern garden area with further garden areas to the west and south. The cottage is subject of separate proposals for a single storey extension (as set out in Section 1 of this Statement).

2.6 The former kitchen garden is largely rectangular with almost continuous brick walls enclosing a single space. The walls are generally between 3.5 and 4.2m in height and constructed in smooth orange, red, and dark bricks in a mix of Flemish or English bond. Within the former kitchen garden a separate section of wall extends westwards from the rear (north) elevation of the Cottage before turning north to extend along the west elevation of the former piggery (as shown in photo 2 above) before meeting the main external wall of the garden.

2.7 To the east of the piggery there is an existing opening in the walled garden with corrugated metal gates. This gap would have historically provided vehicular access to the piggery. Photo 3 below shows the aforementioned gates.



Photo 3: Gap in walled garden secured with corrugated metal gates to the east of the former piggery.

2.8 The site is accessed via an unnamed lane which extends west from Barford Lane which connects the A36 and Downton. The lane runs around the eastern boundary of the kitchen garden past the gates in photo 3 above.

2.9 Standlynch Chapel and its courtyard are located to the east of the lane to the south east of the application site, opposite the cottage. The Chapel is Grade II Listed. Adjoining the site to the north west is Standlynch Mill (also Grade II Listed), beyond which to the west is the River Avon which runs in a north – south direction and adjoins the western boundary of the kitchen garden. As set out above a 19th Century cottage is located to the south of the former piggery beyond a lawn area. Land to the north and east of the former kitchen garden forms part of the Trafalgar House Registered Park and Garden, comprising woodland and open grassland. Land to the south is agricultural land.

2.10 There are a number of Public Rights of Way (PROW) within the vicinity of the site, including the unnamed lane from Barford Lane (immediately to the east of the site) from which PROWs extend north through the Registered Park and Garden and north west along the bank and across the River Avon. A further PROW extends south from Witherington Lane parallel with the River Avon, past Barford Park Farm and into the village of Downton.

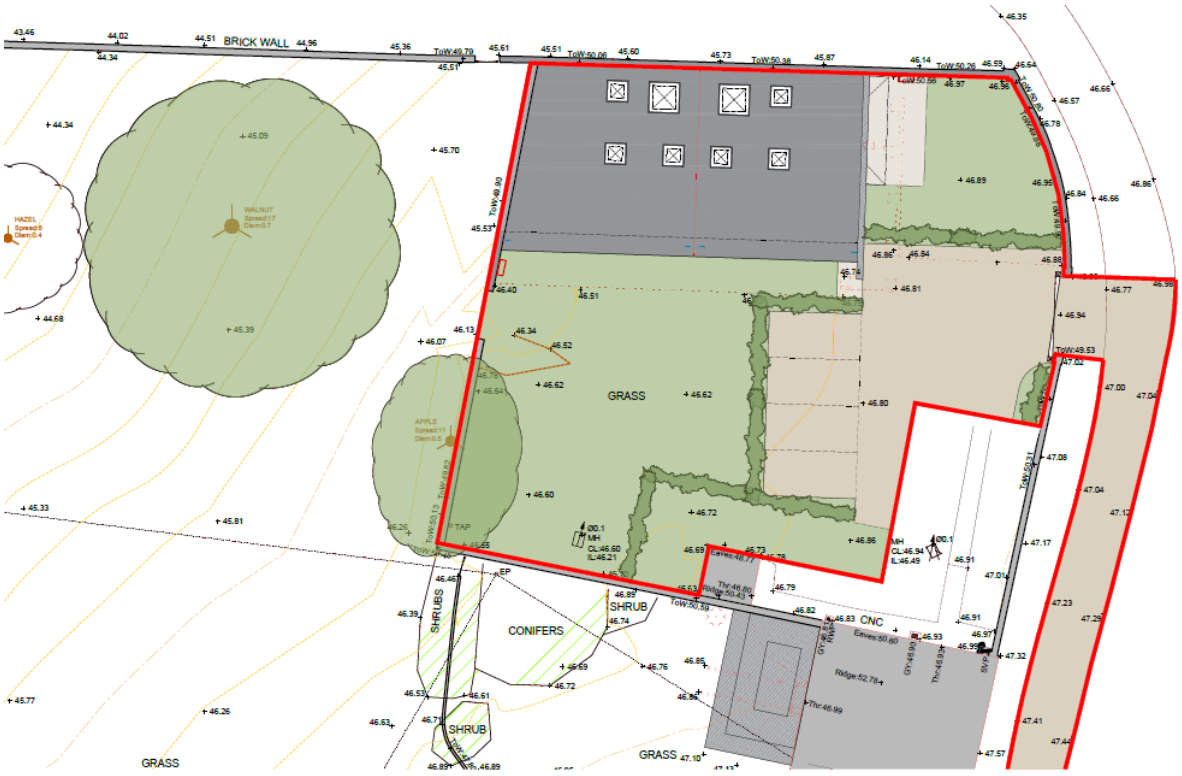
2.11 The application site lies within flood zone 1 which has the lowest probability of flooding, although land to the west of the former kitchen garden, including the River Avon and its bank lie within flood zone 3.

2.12 The site lies outside any statutory landscape designations, although is located within a locally designated 'Special Landscape Area'.

2.13 Whilst the site itself is not subject to any ecological designations it is acknowledged that the adjoining River Avon is a SSSI and an SAC.

3. THE APPLICATION PROPOSALS

3.1 Full planning permission is sought for the demolition of a former piggery building and its replacement with 2 no. holiday lets together with car parking, amenity space, landscaping and associated works. A copy of the proposed Site Plan is inserted below:



3.2 The proposed pair of holiday lets would follow a broadly similar footprint as the existing piggery building, measuring between 17.4m and 19m in width (east – west) and 9m in depth (north – south), resulting in a reduction in both width and depth compared to the existing building. The building would have a mono pitched roof with a ridge height of 3.8m, a reduction of 0.2m compared to the ridge height of the existing building.

3.3 The design of the proposed holiday lets has been informed by pre-applications discussions, including a site meeting with the Council's Conservation Officer. The Council's Conservation Officer acknowledged that the existing building is an eyesore and welcomed its removal but it was advised that an originally designed two storey building with dormers would be unlikely to be supported. It was recommended that a single storey building with 'unadorned roofs' could be acceptable. Full details regarding the pre-application options are set out in the accompanying Heritage Assessment.

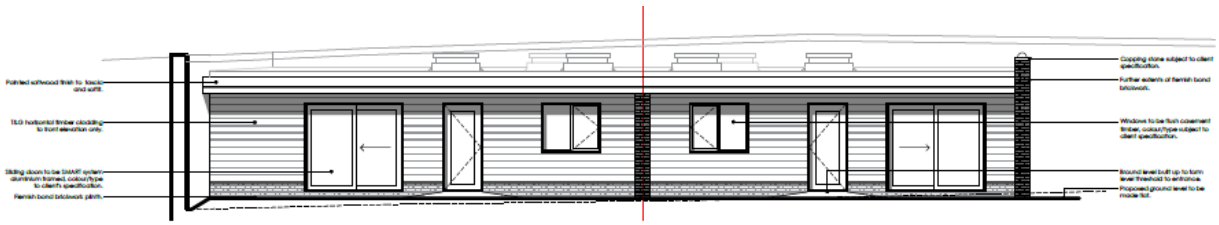
3.4 A contemporary design is now proposed, comprising a single storey building with a shallow mono pitch roof covered in a single-ply membrane with roof rights. The front façade would have a Flemish bond

brickwork plinth with horizontal timber cladding above and the west and north walls would comprise of the kitchen garden walls. To the east elevation the existing flint boarding would be made good and retained. Aluminium framed windows and doors are proposed with the exception of those along the rear (north) elevation which would be timber casements.

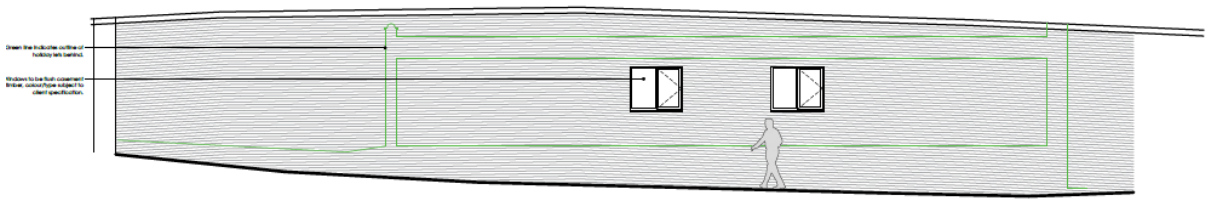
3.5 A shared garden area is proposed to the south of the holiday lets which would be enclosed by 'privacy hedging' (approx. 0.5m high) and separated from the parking area.

3.6 4 car parking spaces are proposed to the south of the holiday lets within an enclosed yard area that is accessed via an existing gap in the wall which is currently enclosed by corrugated metal gates.

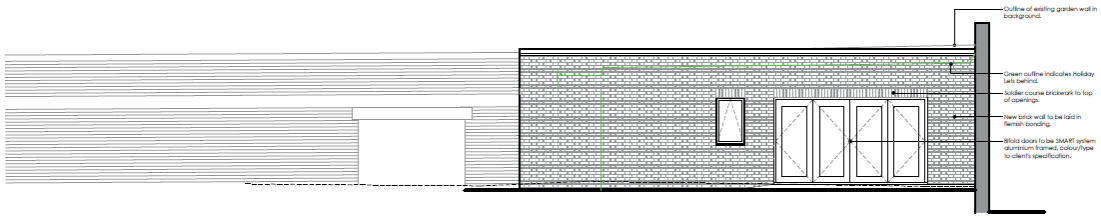
3.7 Extracts of the proposed elevations are inserted below:



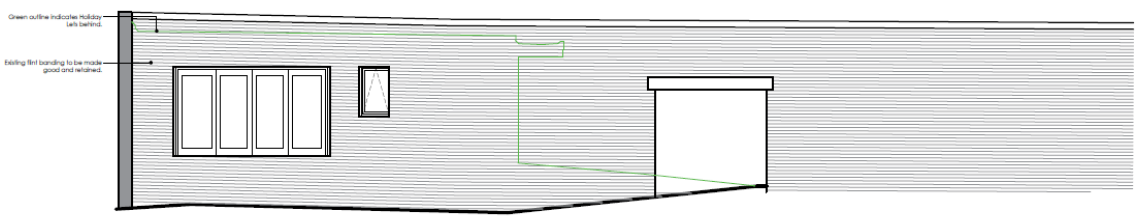
Front Elevation 1:100



Rear Elevation 1:100



Side Elevation 1:100



Side Elevation 1:100

4. RELEVANT PLANNING POLICIES

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is considered to be a material consideration that attracts significant weight.

4.2 This Section refers to relevant national planning policy and guidance as well as Development Plan policies that provide the planning policy framework for this application that should be considered. It deals with the following layers of policy and guidance:

- The Development Plan
- National Planning Policy Framework (NPPF)

The Development Plan

4.3 The Statutory Development Plan covering the application site comprises the:

- Wiltshire Core Strategy (adopted January 2015)
- Salisbury District Local Plan 2011 (adopted in June 2003) (saved policies)

Wiltshire Core Strategy (WCS)

4.4 The WCS was adopted in January 2015. The WCS policies map identifies the application site as being located within the open countryside.

4.5 The most relevant policies in the consideration of the proposals are as follows:

4.6 **Core Policy 39 (Tourist Development)** states that outside the Principal Settlements and Market Towns, proposals for tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages and, where practicable, be located in existing or replacement buildings. Any proposal needs to carefully consider the need to protect landscapes and environmentally sensitive sites with the objective of providing adequate facilities, enhancing enjoyment and improving the financial viability of the attraction.

4.7 **Core Policy 48 (Supporting Rural Life)** provides support for the conversion and re-use of rural buildings for employment, tourism, cultural and community uses where the building(s) is/are structurally sound and capable of conversion without major rebuilding and with only necessary extension or modification which preserves the character of the original building; the use would not detract from the character or

appearance of the landscape or settlement; the building can be served by adequate access and infrastructure; the site has reasonable access to local services and the conversion or reuse of a heritage asset would lead to its viable long term safeguarding.

4.8 **Core Policy 57 (Ensuring High Quality Design and Place Shaping)** requires a high standard of design in all new developments. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. The Policy continues to state that development should enhance local distinctiveness by responding to the value of the natural and historic environment, responding positively to the existing townscape and landscape, being sympathetic to historic buildings and historic landscapes and the use of high standards of building materials, finishes and landscaping.

4.9 **Core Policy 58 (Ensuring the Conservation of the Historic Environment)** requires development to protect, conserve and where possible enhance the historic environment. The Policy states that designated heritage assets and their settings shall be conserved in a manner appropriate to their significance, including historic parks and gardens.

4.10 Other relevant policies include Core Policy 50 (Biodiversity and Geodiversity), Core Policy 51 (Landscape) and Core Policy 69 (Protection of the River Avon SAC).

Salisbury District Local Plan (SLP)

4.11 The SLP policy map identifies the site as lying within the open countryside and within a Special Landscape Area.

4.12 The only relevant policy is **Policy C6 (Special Landscape Areas)** which requires proposals to not have an adverse effect on the quality of the landscape and to ensure that the siting and scale of development is sympathetic with the landscape and that development reflects the character of the area.

National Planning Policy Framework (NPPF)

4.13 The NPP outlines national guidance and the Government's policies on the many different aspects of planning. The latest version of the NPPF was published in December 2023.

4.14 Paragraph 2 explains that planning law requires applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.15 Paragraph 10 confirms that at the heart of the Framework is a presumption in favour of sustainable development.

4.16 Section 6 is entitled "Building a strong, competitive economy". Within Section 6 paraph 85 states that significant weight should be placed on the need to support economic growth. Paragraph 88 seeks to support a prosperous rural economy and states that planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside.

4.17 Paragraph 131 explains that good design is a key aspect of sustainable development. Paragraph 135 sets out that planning policies and decisions should ensure that developments will add to the overall quality of their area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting.

4.18 Section 16 is entitled "Conserving and enhancing the historic environment". Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

4.19 Paragraph 205 states 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. Paragraph 208 states that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

4.20 Paragraph 212 states that LPAs should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal their significance) should be treated favourably.

5. PLANNING ASSESSMENT

Principle of Development

5.1 Wiltshire Core Strategy (WCS) Policy 39 states that outside the Principal Settlements and Market Towns, tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages and, where practicable, be located in existing or replacement buildings. The application site is located within close proximity of the Local Service Centre of Downton (located circa 1500m to the south) and would involve the replacement of an existing building as supported by Policy 39.

5.2 In addition to WCS Policy 39 the NPPF (paragraph 84) states that planning policies and decisions should enable sustainable rural tourism which respect the character of the countryside as part of central governments support for a prosperous economy. Whilst the proposals involve a small scale tourist development the proposals would contribute to the overall visitor economy in this part of Wiltshire with occupants supporting local services and facilities such as pubs, shops and tourist attractions.

5.3 The pre-application advice from the LPA also highlights that the site is adjacent to a network of footpaths and the River Avon, which would be attractions for prospective occupiers and the Officer concluded that *"if it can be demonstrated that the replacement building on the site of the piggery would not harm the settings and significance of the heritage assets then the proposed holiday lets may be acceptable in principle under Policy 39, which permits replacement buildings for tourism use".*

Heritage Impact

5.4 The application site lies within the setting of the Grade II Listed Standlynch Church and within the Grade II listed Trafalgar registered park and garden. As set out above (in Section 3) the application proposals have been worked up following pre-application discussions with the Council's Conservation Officer. A Heritage Impact Assessment is submitted as part of the planning application and concludes:

- The removal of the unsightly former piggery building would improve the setting of the walled garden and neighbouring cottage to the south.
- The modest, domestic scale and nature of the proposed holiday lets would be subservient to the cottage and would read as an ancillary building.
- The contrasting contemporary approach to design would clearly distinguish the new structure from historic buildings on the site.
- The use of brick and timber weatherboard cladding would harmonise with the existing brick walls and the parkland setting.

- The mono-pitched roof of the proposed building would be set below the top of the surrounding walls and would be screened from the lane so as to be out of public view and not visible from the listed chapel.

- The existing walls of the walled garden within the application site would be retained, with minimal alteration to openings. The reduction in the opening in the wall (to a pedestrian doorway) that would form the west wall of the holiday lets would improve the enclosure with the main walled garden.

- The parking for the units would be contained within the walled enclosure, ensuring no adverse visual impact on the setting of the listed chapel.

5.5 The Heritage Assessment summarises that the new use, traffic movement and parking would give rise to a low level of activity and noise resulting in minimal harm to the ambience of the Grade II registered park and garden and the setting of the Grade II listed chapel. It is therefore concluded that this would equate to 'less than substantial harm' under the terms of the NPPF, at the low end of the scale and that the heritage benefits from the enhancement and restoration of this part of the walled garden would outweigh the less than substantial harm that would be caused.

Landscape Impact

5.6 The application site lies within a Special Landscape Area and as such saved Salisbury Local Plan Policy C6 requires development to have a particular regard to the high quality of the landscape.

5.7 There are a number of PROW within the vicinity of the application site as set out in Section 2 of this Statement. The proposed replacement building would be set below the top of the surrounding walls of the former kitchen garden and as such the building would be screened from the PROW that run along the lane to the east of the site and to the north parallel with the wall forming the north elevation of the proposed building. Furthermore, the proposed building would be smaller in footprint than the building to be removed and would replace an unsightly building with a modest and contemporary building that would enhance the appearance of this part of the former kitchen garden.

5.8 A landscape scheme is also submitted as part of the application which would provide further visual benefits across the site.

Highway Safety, Rights of Way, Parking and Access

5.9 A Transport Note, prepared by Nick Culhane Highway Consultant is submitted as part of the planning application and seeks to address the highway safety issues associated with the proposals as well as addressing advice provided by the Highway Authority as part of the pre-application advice provided.

5.10 The proposed holiday lets would be accessed from an existing access onto Barford Lane which is subject of the national speed limit. To determine the required visibility splays at the site entrance a speed survey was undertaken over a period of seven days. The results of the ATC showed 85th percentile speeds of 33.4 mph for northbound vehicles and 33.6 mph for westbound vehicles which will require visibility splays of 2.4m x 50m. A Plan attached at Appendix 2 of the Transport Note shows how this would be achieved. A further plan at Appendix 4 of the Transport Note shows how appropriate forward visibility would be achieved ensuring that anyone wishing to turn right into the site can see and can be seen from the south.

5.11 The existing site access is also proposed to be improved to provide 3.0m radii and widened to 5.0m with a consolidated surface material.

5.12 In terms of vehicular trip generation, the Transport Note estimates that the 2 holiday lets would generate anywhere between 0 and 8 trips per day with such trips unlikely to take place 365 days a year given the use of the building as holiday lets. The Transport Note therefore concludes that the amount of traffic likely to be generated would have very little impact on the surrounding highway network.

5.13 As part of the pre-application advice provided the Highway and Public Right of Way Officer queried the Applicants right of vehicular access along the access from Barford Lane which forms public right of way number DOWN44. A copy of an email from the Applicants Solicitor together with a plan of the PROW is attached at Appendix 1 confirming that the Applicant (and all persons authorised by her) is authorised to pass with or without vehicles over and along the PROW (as shaded green on the accompanying plan) to and from the highway.

Ecology

5.14 A Phase 1 Ecological Survey is submitted as part of the application. The Survey concludes that the former piggery building had no physical signs of bats using the building but that there are gaps and areas where bats could possibly roost and as such that at least 1 phase 2 bat activity survey will be required to ascertain if bats are using the building. A reptile survey is also recommended. These additional surveys will be undertaken and submitted during the course of the application.

Residential Amenity

5.15 The closest residential properties to the application site are the Cottage immediately to the south and also in the Applicants ownership and Bundays Lodge which is circa 130m south east of the application site.

5.16 The proposed holiday lets would be residential in character and nature and as such would not be expected to give rise to adverse noise and disturbance to the existing neighbouring properties, particularly to Bundays Lodge.

River Avon and Phosphates

5.17 It is acknowledged that the site falls within the catchment of the River SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorous in wastewater. It is understood that the Council has agreed a Memorandum of Understanding with Natural England and others that measures will be put in place to ensure all developments permitted between March 2018 and March 2026 are phosphorous neutral in perpetuity. To this end it is currently implementing a phosphorous mitigation strategy to offset planned residential development, however it is understood that this excludes development which provides overnight accommodation for people whose main address is outside the catchment (i.e. tourist accommodation).

5.18 It is understood that the Council are discussing a strategic approach to phosphorus mitigation to include tourist accommodation which would enable this development to provide phosphorus neutrality in perpetuity.

6. SUMMARY AND CONCLUSION

6.1 Full planning permission is sought for the demolition of an existing piggery building and its replacement with 2 no. holiday lets together with car parking, amenity space, landscaping and associated works.

6.2 The application site is located within walking distance of the Local Service Centre of Downton and as such the principle of replacement buildings for tourism development is accepted under Wiltshire Core Strategy Policy 39. Furthermore, the proposals would provide accommodation for tourists who would use local services and facilities such as pubs, shops and tourist attractions providing wider support for the local rural economy.

6.3 The proposed use, traffic movement and parking would give rise to a low level of activity and noise resulting in minimal harm to the ambience of the Grade II listed registered park and garden and the setting of the Grade II listed chapel. This would equate to 'less than substantial harm' under the terms of the NPPF, at the low end of the scale and the heritage benefits from enhancement and restoration of this part of the walled garden would outweigh the less than substantial harm that would be caused.

6.4 The existing access onto Barford Lane would be improved and satisfactory visibility splays can be achieved. The level of traffic generated would be negligible and would have little impact on the surrounding highway network.

6.5 In summary, the application proposals would result in the removal of an unsightly building within a Grade II listed registered park and garden and within the setting of the Grade II Listed Standlynch Chapel. Its replacement would provide a modest contemporary building that has minimal impact on identified heritage assets and enables a new use to be introduced to the former kitchen garden of Trafalgar Gardens which in turn will support the local tourist and rural economy. It is therefore respectfully requested that planning permission is granted subject to any necessary and appropriate conditions.



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