



RCC TOWN PLANNING CONSULTANCY



Site: The Library Flat, Manton House Stable Yard,
Manton, Marlborough, Wiltshire, SN8 1PN

Proposal: Remodelling of existing residential flat at first
floor level

On behalf of: Mr and Mrs Sangster

Date of Issue: November 2025



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PLANNING, DESIGN AND ACCESS STATEMENT INCORPORATING HERITAGE ASSESSMENT

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1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of the applicants, Mr and Mrs Sangster, in support of these applications for full planning permission and listed building consent. The proposal covers the remodelling of an existing three-bedroom first floor flat, known as the Library Flat, located within the southwest quadrant of Manton House Stable Yard.
- 1.2 The applications necessitate a Design and Access Statement and Heritage Assessment as they involve alterations to a grade II listed building. These requirements are incorporated into this planning statement.
- 1.3 This statement will examine how the proposed development relates to the site and its context. The statement will also provide an explanation and justification for the scheme having regard to the national and local plan policy context.



2.0 SITE CONTEXT, HISTORY & DEVELOPMENT PROPOSAL

- 2.1 This application relates to the 'Library Flat' at Manton House Stables, formally part of the Manton Estate, located approximately 2 miles northwest of the market town of Marlborough, Wiltshire.
- 2.2 The application site itself and the wider Manton Estate are washed over by the North Wessex Downs National Landscape (formerly Area of Outstanding Natural Beauty) designation. Aside from this, the site is not covered by any other landscape or arboricultural designations or restrictions and in respect of flooding, the land falls within Flood Zone 1 (lowest risk).
- 2.3 Manton House and Stables, along with The Chapel was acquired by the applicants in 2017 as part of the subdivision of Manton Estate, a renowned equestrian country estate and racing stables. The principal racing stables are now known as Manton Park and fall under separate ownership to the site.

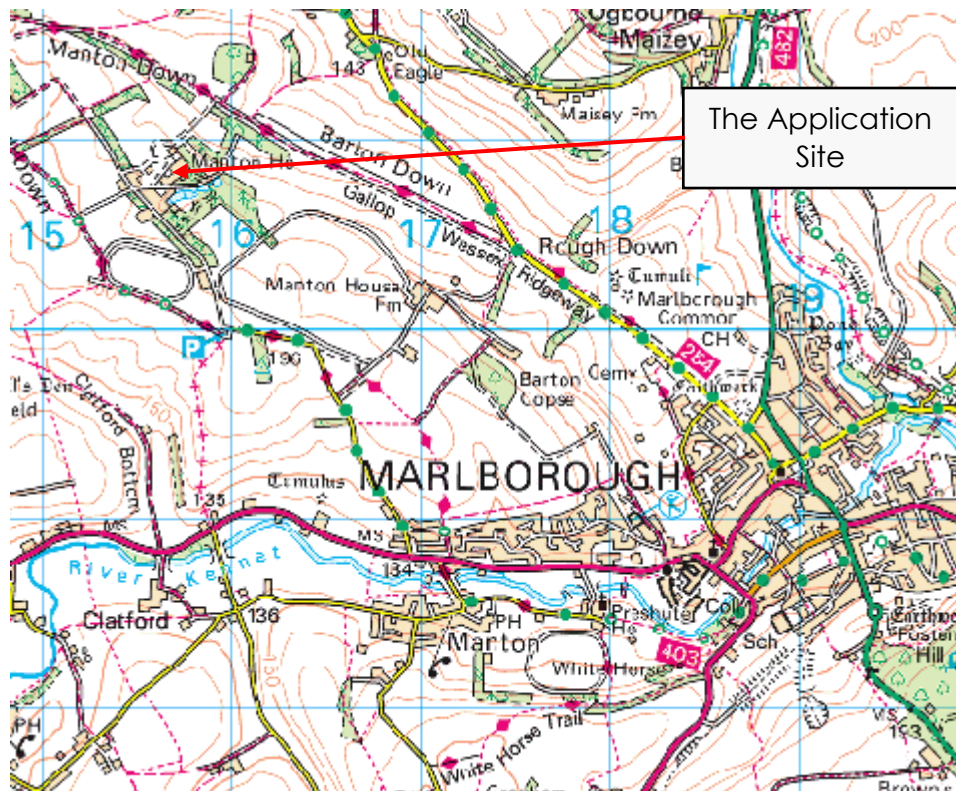


Figure 1: OS Map showing application site and surroundings

- 2.4 Whilst Manton House and The Chapel are unlisted, its courtyard range of stable buildings and its lamp standard are listed at Grade II. The stable buildings form an attractive quadrant of development, and together with Manton House, served as the principal residence of the former Manton Estate.
- 2.5 The list description for the Stables to Manton House is recorded as follows:

Heritage Category: Listed Building Grade: II List Entry Number: 1033832 Date first listed: 02-Sep-1986

STABLE RANGE AT MANTON HOUSE SU 17 SE PRESUTE - 7/111 Stable range at Manton House GV II Range of buildings enclosing courtyard on north-west side of Manton House. c 1870-80. Brick, with tiled roof. Domestic revival style with central gatehouse with jettied and timber framed first floor with half hipped roof. Either side, ranges of single storey stables with stable doors and windows. Remains mainly as built - a high quality courtyard group.



Figure 2: Photograph showing main entrance to listed stables (taken within quadrant)

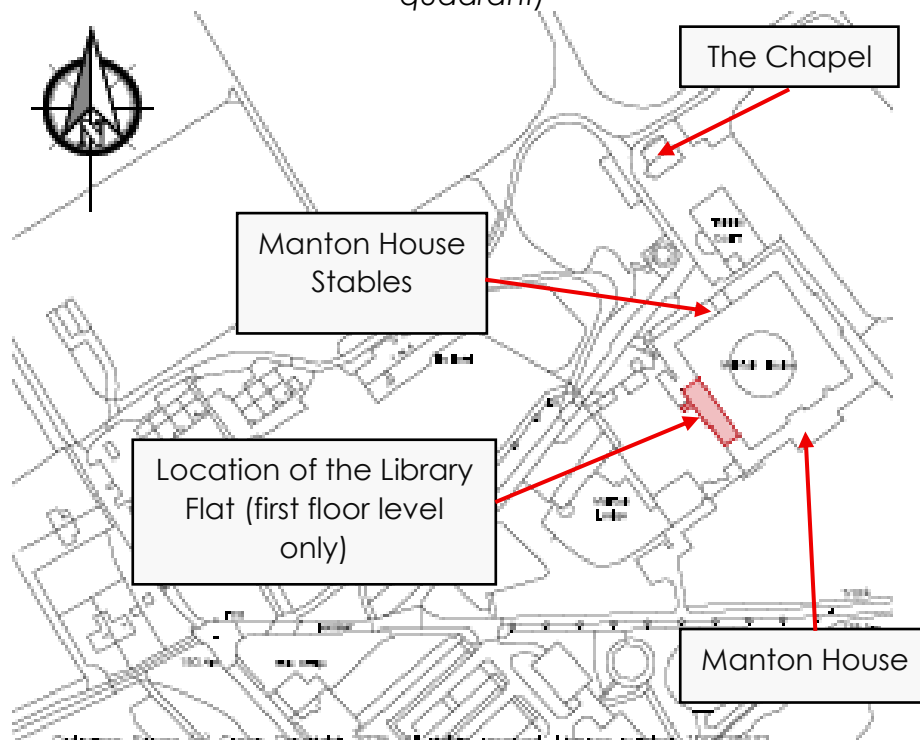
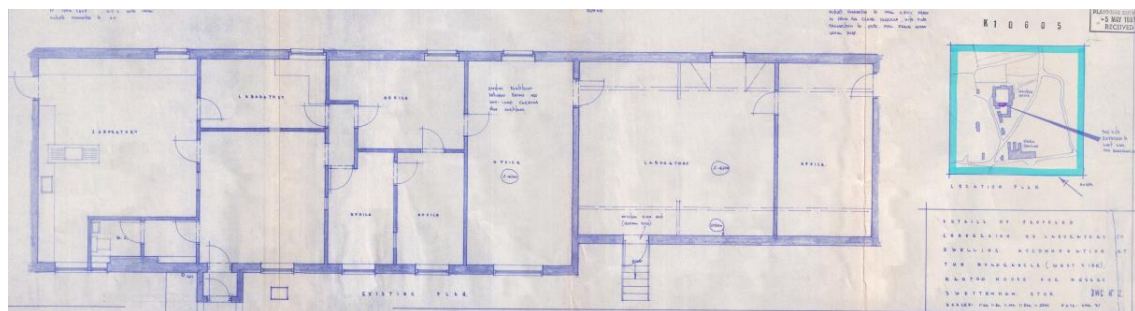


Figure 2: Map illustrating location of The Library Flat in relation to Manton House and listed stables

- 2.6 The Manton House Stable range forms the southwest, northwest and northeastern sides of a courtyard, the final southeastern side being enclosed by unlisted Manton House. This application relates to a first-floor section of the southwestern range only.
- 2.7 Whilst there is an extensive planning history relating to the buildings and the wider estate, this can be accessed via the Council's planning map system and it is not repeated here in full. However, the most pertinent planning history is discussed below.
- 2.8 The section of the building to which these applications relate was permitted for conversion to form veterinary laboratory, office and library facilities in 1984 under planning reference K/84/1086. This permission appears to have been implemented as the functions are clearly labelled within the 'existing' plans shown as part of the later 1987 application shown in figure 3 below. From inspection, it seems likely that to facilitate the approved conversion, this part of the building was 'gutted', with new lightweight stud partitions, new plasterwork and carpentry throughout.
- 2.9 Under planning reference K/10605, in 1987 permission was sought for conversion of the first-floor areas the subject of this application, to residential use. The plans proposed to provide one flat in the former laboratory including the creation of an additional entrance, and further subdivision including the creation of a central access corridor to facilitate a 7-bedroom unit for multiple accommodation relating to the possible equestrian staff need at that time. This application was also approved subject to conditions.



- 2.10 It is understood that the approved 1987 consent was not implemented in such a compartmentalised manner as shown, but instead the same areas were combined and converted simply to provide a single 3- bedroom flat, known as The Library Flat. The building areas have been used as a single residential flat ever since. Council tax records confirm 'The Library Flat' was first registered for Council Tax in 1993, which corroborates the changes undertaken around this period. See **Appendix A**.
- 2.11 Regarding external appearance, the changes undertaken at that time differed from the approved scheme, with the position of the second entrance changed to the end of the taller building section; the addition of a larger porch and with over the eaves windows being swapped out for two small rooflights.

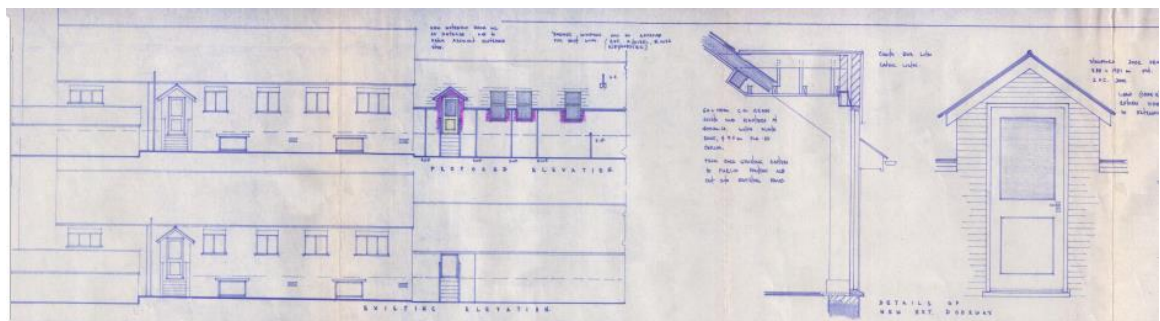


Figure 5: Showing existing 1987 southwest elevation in the lower drawing, with the approved proposed changes shown in the upper elevation drawing.

- 2.12 In relation to other relevant planning history at the site, it is noted that in 1989, permission was granted to allow the conversion of the east and northern quadrants to provide 7 dwellings under original reference K/13477, and it is surmised that this may have been considered a preferred option over the previous approved multiple accommodation in the south-western wing granted under the 1987 permission. This was at a time when the racehorse industry was rapidly expanding and the Estate's plans were clearly evolving, as can be seen from the more extensive proposals for the estate dating from a similar period.
- 2.13 Most recently, permission was granted in 2021 to convert the Chapel building to an independent dwelling under reference number PL/2021/07521, with a later 2025 permission granted for alterations to the proposed conversion scheme.
- 2.14 The photographs following include the first-floor elements of the building where the existing flat is located. Whilst it can be seen that the ground floor of the building contains a number of more notable architectural features, such as the decorative brick arches with keystones above openings and the nature, regularity and design of those openings which were purpose designed to provide stabling and associated facilities, the first-floor level details are quite

simple and rather non-descript, save for the matching brickwork and roofs, with plain dark-coloured two-light casements above stone cills.



Figure 6: Showing existing NE elevation of the southwestern wing.

- 2.15 Here, the Library Flat is located at first-floor level where it is laid out as an existing 3-bedroom residence. Its entrance is taken from the (outer) southwest elevation, through an existing porch addition, accessed from a small garden area which is level with the first floor.
- 2.16 The rear elevation is clearly a 'secondary' elevation, with more limited architectural detailing and many more contemporary alterations and features. These include the use of white UPVC windows and doors, the long rendered rear porch and additional more utilitarian openings. The existing dormer gabled window on the rear elevation (located beyond the extent of the existing flat) shown in figure 7 below is also a later addition. This is apparent by its steeper pitch and crisper detailing, although some care has been taken to reflect features on the inner elevations including the brick arched lintel detailing, the cills and decorative bargeboard feature.



Figure 7: Showing part of the rear elevation of the Library Flat towards the left, (gabled dormer is beyond the flat's extent)



Figure 8: Showing part rear (SW) elevation with existing main flat entrance through porch



Figure 9: Showing existing part SW elevation – flat extends beyond the dividing boundary treatment on the right of this photograph

- 2.17 This elevation is therefore less sensitive to change than the inner courtyard which remains much more original. Existing and proposed elevations are provided below and these show how the external changes are relatively limited and have been carefully specified so as to reflect the character of the original building. Indeed, the most notable changes are to the fenestration, with the addition of a new dormer to match existing, one 'letterbox' style window, again to match existing, and a number of flush style conservation rooflights. It is proposed to finish the rooflights in matt black such that they would appear quite discrete against the roofslope. Care has been taken with the positioning of these openings to ensure they can sit between existing purlins and rafters to minimise their impact.

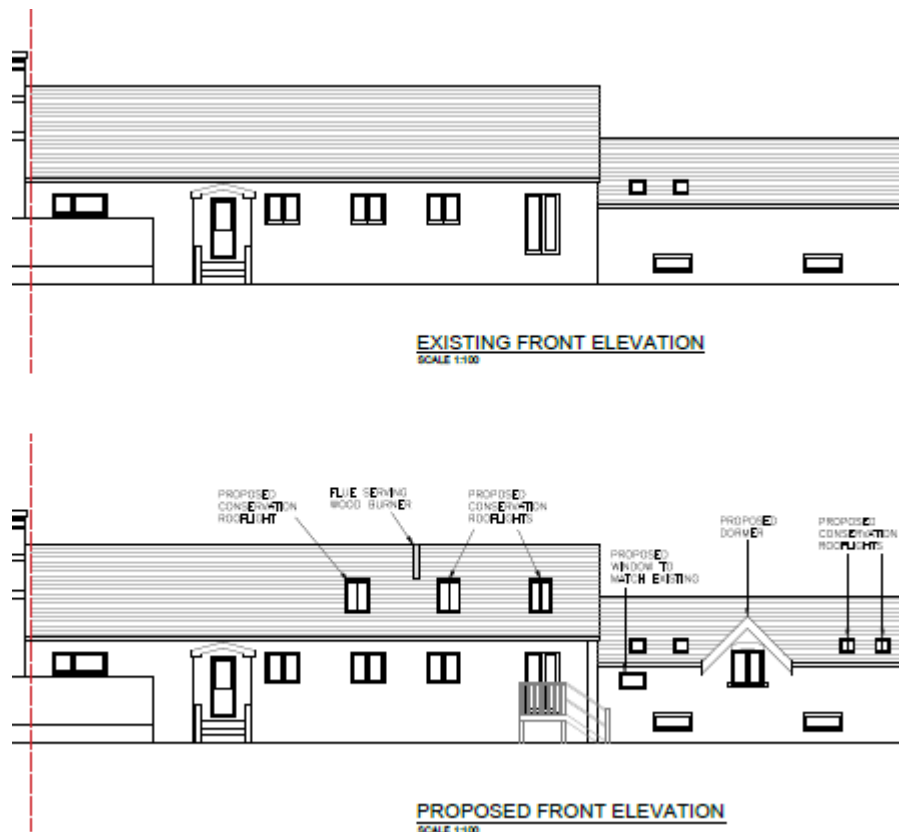


Figure 10: Showing existing and proposed elevation (no changes to inner courtyard elevation)

- 2.18 Internally, the existing accommodation lacks order, with bedrooms mixed in with the living accommodation. The applicants now seek to re-order the accommodation to separate the principal bedroom areas from the living areas and arrange those living areas better to suit modern living. Additional natural light is desired to help reduce energy costs and provide enhanced living conditions for the occupants to suit the new layout.
- 2.19 As noted as part of the planning history, the flat has clearly undergone significant modernisation at some point, with crisp, modern plasterwork, contemporary doors and carpentry, modern stud partitions and little in the way of any historic features. Consequently, the flat has the potential to accept changes to the layout without impacting the building's heritage interest.
- 2.20 There is one load-bearing wall situated as the dividing wall between the taller and lower elements and the lower elements (bedroom) have a skilling ceiling, with beam partially exposed and painted white. These will all be retained as existing save for a small adjustment to the position of the opening in the wall. Other affected walls are all lightweight modern stud partitions as shown on the proposed floorplans. Roof timbers will all be retained as existing.

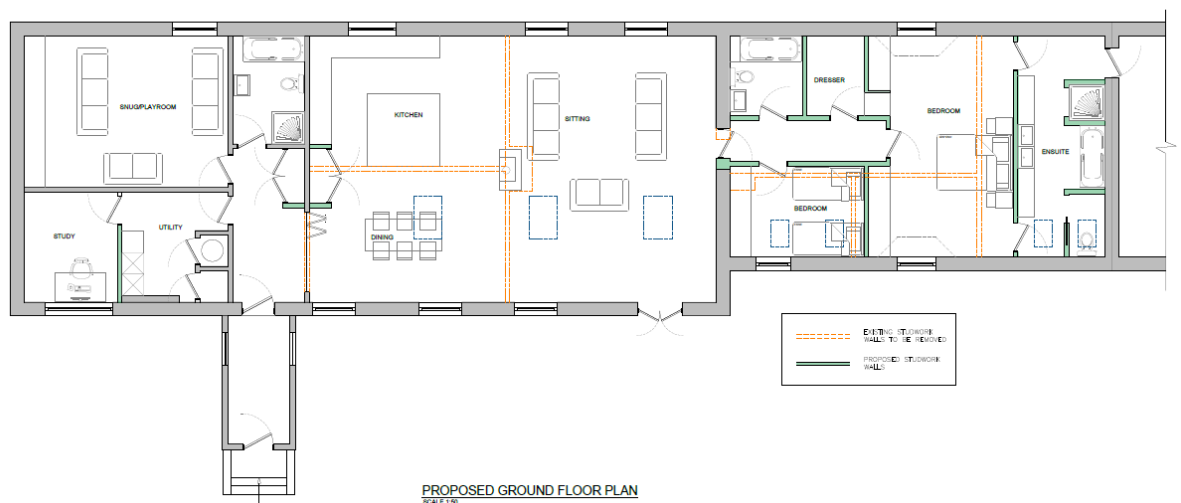
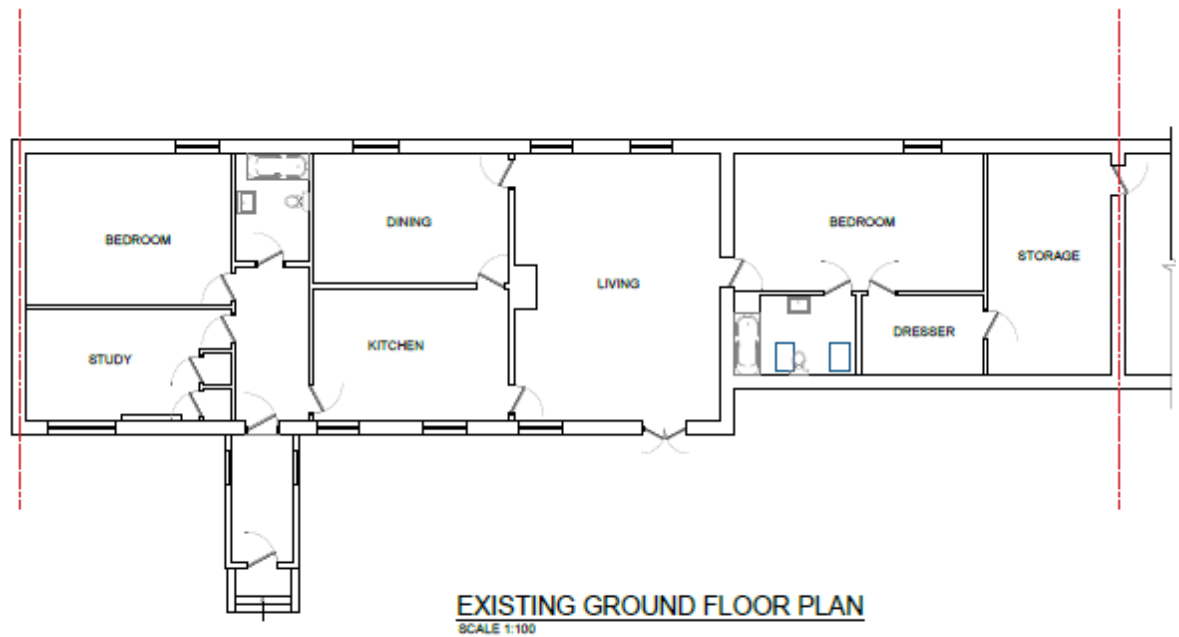


Figure 11 showing layout as exists today above and proposed layout below.



Figure 12: Showing existing kitchen with wholly modern features, typical of the flat.

- 2.21 The changes will see modern stud partitions removed within the central area to form an open plan living, dining, kitchen area, with a separate snug, bathroom, utility and office at the northern end of the flat. The southern end of the flat will be remodelled to contain the principal bedroom areas. As part of these changes, a new gabled window is proposed to serve the new master bedroom and some additional and replacement rooflights. This would match the existing on the same elevation shown in figure 7 above and as specified in the drawings.

3.0 PLANNING POLICY

- 3.1 The main planning policy framework relevant to this proposal is the Wiltshire Core Strategy 2011-2026 (WCS).
- 3.2 Material considerations comprise the Government guidance within the National Planning Policy Framework 2021 (NPPF) and the accompanying guidance within the National Planning Policy Guidance (NPPG).
- 3.3 The site falls within the parish of Preshute which has yet to be designated as part of any Neighbourhood Plan Area.
- 3.4 The relevant policies and guidance are set out in the associated tables:

WILTSHIRE CORE STRATEGY

Policy	Title
CP1	Settlement Strategy
CP2	Delivery Strategy
CP14	Marlborough Community Area
CP48	Supporting Rural Life
CP51	Landscape
CP57	Ensuring High Quality Design and Place Shaping
CP58	Ensuring the Conservation of the Historic Environment
CP67	Flood Risk

NATIONAL PLANNING POLICY FRAMEWORK

Chapter	Title
5	Delivering a sufficient supply of homes
11	Making an effective use of land
12	Achieving well-designed places
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

4.0 PLANNING ASSESSMENT

4.1 The key issues are considered to be:

- The principle of the remodelling of existing residential accommodation
- The effects of the proposed changes upon the character and setting of the Grade II listed building (heritage assessment), whether they represent high-quality design and are acceptable in visual amenity terms.
- Residential amenity
- Clarification on other detailed matters, including notes on the National Landscape, Biodiversity Net Gain, parking and drainage

4.2 These will be considered in turn below.

Principle of Development

- 4.3 As outlined above, residential conversion of this first-floor part of the quadrant was originally permitted in 1987, in association with the former use of the site as a racehorse yard. This followed an earlier permission to utilise this part of the building for a library, veterinary laboratories and offices. Although the 1987 permission was not implemented as approved, this part of the building was converted into a single three-bedroom flat, and it was accordingly registered for Council Tax in 1993 as 'The Library Flat' (see **Appendix A**). Having been utilised as such since then, it is considered that the principle of the Library Flat's use as an independent dwelling is already established.
- 4.4 Since this time, the requirements for modern racing stables have moved on, and the ownership of Manton House and Stables has been severed from the modern racehorse facilities.
- 4.5 Notwithstanding our view that the principle of the use is firmly established, the conversion of buildings to residential use are in any case, acceptable in principle, as allowed by both National Planning Policy and Core Policy HC48 of the Wiltshire Core Strategy, and in line with the recent permissions granted to convert The Chapel on the same estate.
- 4.6 Policy CP48 allows conversions of existing buildings as an identified exception to the general approach of the core strategy towards the location of new housing development. This is to help meet the Government's clear aim to 'significantly boost the supply of homes' as set out in Chapter 5 and to make more effective use of existing sites encouraged by Chapter 11 of the NPPF, reinforced by numerous ministerial statements.
- 4.7 Whilst policy CP48 affords a preference for the use of the building for employment, tourism, cultural or community uses over residential, it is clearly an impractical proposition to utilise the upper floor of this listed building to serve in such uses, being a more isolated location with limited parking and located in part of a grade II listed building adjacent a large private residence. It is noteworthy too, that this 'cascade' approach to planning land use is not mirrored or endorsed in the more recently published NPPF nor is it proposed to



be carried forward in the emerging Revised Wiltshire Local Plan (see draft Policy 82), which, when formally adopted will only require compliance with one of four criteria including either:

'2. The proposal would enable a viable and sensitive alternative use of a heritage asset in a manner which secures its protection and longevity, and retains the characteristics for which it is valued as a heritage asset.'

OR

'3. The proposal is for the conversion or re-use of a disused building in the countryside. In such circumstances, evidence will be required to show that the building is structurally sound and capable of conversion without major rebuilding, and that the development would enhance the character of the original building and its setting.'

- 4.8 Not only is a continuing residential use therefore the most appropriate use for The Library Flat, but we submit it continues to represent the optimal viable use of this heritage asset, compatible with existing adjacent residential uses, as supported by paragraph 80 of the NPPF. It would secure a sensitive remodelling and upgrading of the flat, making it far more suitable to be retained in use and able to make a valid contribution to the estate as a whole.
- 4.9 As stated, given the proposals would simply re-model an existing residential flat which was originally converted in the 1990's to remain in residential use, we do not believe a full Policy CP48 assessment is warranted. Notwithstanding this, we believe the proposal, like the nearby Chapel conversion, would clearly meet the criteria, being structurally sound and capable of conversion (it is already an existing residence) and being a use which would not detract from the character and appearance of the landscape nor be detrimental to residential amenity (see also planning assessment below). Furthermore, the site is already served by adequate access and infrastructure, being a long-established residence with pre-existing infrastructure and at a location which once served in far more intensive use. The final two criteria are an either / or as per the adopted version of the WCS (**NB:** the 'or' was incorrectly omitted from the published version), with criterion v) being relevant here; that the proposed remodelling of this flat would help lead to its viable long-term safeguarding by securing investments and upgrades, enhancing the use of this part of the building and the potential contribution it makes to the estate and its wider setting.
- 4.10 Consequently, even if it was to be felt that the pre-existing residential use, established in the early 1990's was insufficient to establish the principle of the residential use, the proposed 'conversion' scheme would still accord with planning policies which allow for the conversion of heritage assets in particular circumstances as set out in the NPPF and the WCS.

- 4.11 Additionally, Chapter 11 of the NPPF specifically recognises the need to make better use of existing sites to meet needs. In this instance, the Council has an acute need for more housing and the proposals would help meet this need.
- 4.12 In fact, the Council's significant shortfall in 5-year housing land supply means that existing housing supply policies are out of date and the firm presumption in favour of granting permission is invoked as per paragraph 11d) of the NPPF.
- 4.13 In summary, whilst we do not believe it is necessary for the Council to reconsider the principle of residential use, given this relates simply to the remodelling of an existing flat, nevertheless, we submit that even if this were being considered afresh, for the reasons identified, it would still align with planning policy at all levels.

Heritage assessment, visual amenity and high-quality design

- 4.14 As set out in section 2.0 above, the existing interior of the flat is largely non-historic. Features of some note include one existing solid dividing wall at the join of the two sections of building and the presence of some partially exposed beams in the section of the flat with a lower roof. These would be retained as part of the proposals.
- 4.15 The internal changes identified in the plans shown above, primarily affect modern fabric and contemporary layout. Consequently, they would have only a negligible impact on the heritage interest of the building.
- 4.16 Similarly, great care has been taken to conserve the inner courtyard elevation, noting that this is the area of greatest sensitivity. Thus, no external changes whatsoever are proposed here.
- 4.17 The addition of openings within the outer elevation are proposed only to provide suitable natural light and ventilation to suit the remodelling of the flat; to improve living conditions, and to enhance and balance the master bedroom area given the limited head height in this section. The number and positioning of those openings have been carefully considered to avoid any conflicts with historic timber work. All new openings have been carefully specified to meet the high-quality design requirements when dealing with listed buildings, regardless of the previous use of unsympathetic materials and design detailing.
- 4.18 Proposed works include the dormer being specified to meet the existing rear dormer, with high quality brickwork, matching slopes and height and all matching design detailing including decorative arch, cill, white painted paired timber casements and decorative bargeboard. Rooflights are specified to be flush style conservation varieties, finished in a matt black to minimise their effect on the appearance of the building. The oblong 'letterbox' timber window also reflects similar types of windows which are pre-existing within this elevation and are thought to be an older feature. The flue would be a simple metal protrusion finished in matt black also.
- 4.19 As a result of this assessment, and as required by the NPPF Chapter 16, it is clear that the proposals would not result in any 'substantial' level of harm. In considering any proposals which involve a 'less than substantial' harm to

significance of the heritage asset, paragraph 215 sets out that this must be *'weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.

- 4.20 This section has detailed how the proposals have been carefully specified so as to minimise impact on both historic fabric and the character and appearance of the building. In doing so, it is considered that the proposals represent a sensitive re-imagining of the existing residential flat. The proposals will breathe new life into the current flat which currently contains a number of fairly dark, uninviting spaces, and a confused layout which mixes bedrooms with living areas. By reordering these spaces, the opportunity is being taken to provide attractive, high-quality spaces far more suited to modern living with enhanced natural light and ventilation, improving the wellbeing of its occupants, reducing energy bills and improving the building's sustainability credentials. In turn, the proposed remodelling will secure upgrades and investment in the flat and will likely ensure that the flat continues to be occupied as a residential unit over the longer term. This, in turn, will likely lead to investment in ongoing upkeep, thus helping to conserve this heritage asset (and the wider estate) for the future.
- 4.21 Residential use, as mentioned previously, is considered the optimum viable use of this part of the building given the constraints of this building as a whole, and other nearby residential uses.
- 4.22 Thus, it is concluded that the very limited level of harm to the heritage asset, would be far outweighed by the public benefits, including retaining the building in its optimum viable use.
- 4.23 The proposals thus accord with Core Policy 58 of the Wiltshire Core Strategy and Chapter 16 of the NPPF.
- 4.24 As regards visual amenity and landscape impact, the proposed changes to the rear elevation are of a relatively modest nature. They are situated as part of a private estate and within a highly contained rear 'courtyard' area where it is surrounded by other buildings. In this location, the changes would not be visible from any public vantage points and there would be no harm to the wider landscape.
- 4.25 As such, the proposals would conserve the national landscape and would not detract from the visual amenities of the area. As such, the proposals accord with Policy CP51 of the WCS and Chapter 15 of the NPPF.

Residential amenity

- 4.26 The residential use of the existing flat is longstanding. There is, however, the potential for some openings to provide greater overlooking of the adjacent garden area (even though this is presently a secondary, little used area and is within the same ownership).
- 4.27 The proposed rooflights would be at least 1.7 metres above the internal finished floor level and other openings would all look directly onto the garden area relating to this flat and which is flanked by a tall screen. As such, there would



be no particular loss of privacy, overlooking or other particular amenity matters arising from the proposals and the proposals therefore accord with Policy CP57 of the WCS and Chapter 12 of the NPPF.

Clarification on other detailed matters, Biodiversity Net Gain, parking, waste and drainage

- 4.28 Regarding Biodiversity Net Gain, the proposals do not involve 25 square metres of habitat as there are no changes beyond the existing envelope of the building. As such, the proposals are exempt.
- 4.29 There is currently ample space for parking, turning and the storage of domestic waste and recyclables within the red line area outlined for the site location plan. There are no proposed changes as this is a pre-existing 3 bedroom flat.
- 4.30 Similarly, the proposed changes would not result in any increased burdening of the existing drainage system and there are no changes which would increase surface run-off. Consequently, these matters do not require further consideration.

5.0 CONCLUSION

- 5.1 This statement has justified why the proposed remodelling of this existing flat is entirely compatible with both the Wiltshire Core Strategy and the advice and guidance contained within the NPPF.
- 5.2 It has justified and evidenced that the residential use of the flat is long-established. Nevertheless, it has also explained how, in any case, a residential use of this flat would accord with the current planning policy regime which is further reinforced by the Council's lack of 5-year Housing Land Supply.
- 5.3 This statement has considered the significance of the heritage asset including notable features of heritage interest including at both the flat itself and how it sits as part of the wider stables and estate complex. It has identified that the existing flat is internally largely devoid of heritage interest. Its layout is notably compromised, lacking in natural light and ventilation and is not arranged for modern living. It has reasoned why the proposed changes are sensitive to the heritage interest of the building and can be suitably accommodated without causing any notable harm.
- 5.4 This statement has explained why retaining the flat in long-term residential use does indeed, represent its optimum viable use, and how the proposed changes would hugely enhance the living conditions for occupants and would likely secure investment in this heritage asset for the future.
- 5.5 Residential amenity, parking, waste storage, drainage and Biodiversity Net Gain have all been briefly covered, as it is considered that there will be no particular impacts over and above the existing situation.
- 5.6 Consequently, the proposals accord with planning policy at all levels, and the Council is respectfully invited to grant planning permission and listed building consent for the proposed works.