

Major Projects & Performance Manager
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

FAO: Ms Helen Garside

Our ref: GAO/SAV/HDA/SWA/U0011639

Your ref: PP-14633988

23 January 2026

Tottenham House and Estate, Savernake, Marlborough, Wiltshire, SN8 3BE
Town and Country Planning Act 1990 (as amended)
Approval of Details Application to Partially Discharge Condition 20 (Floors)
(ref. 18/00195/LBC)

On behalf of our Client, Mr Chris Rokos ("the Applicant"), we write to enclose an application for the approval of details required by condition, in order to partially discharge Condition 20 (Floors) of Listed Building Consent (ref. 18/00195/LBC) in relation to the Ground Floor Floor Finishes at the Old Stables at Tottenham House and Estate.

Background

The application site is the Old Stables which is a Grade II* listed 1820s stable block located to the north-west of the Main House within the wider Tottenham House Estate. The Old Stables is referred to as 'Building 2' on the approved masterplan of the Outline Planning Permission (ref. 17/12461/OUT).

The Grade II* listed Old Stables building currently remains on Historic England's 'Risk Register' as being "most at risk of becoming lost as a result of neglect, decay or inappropriate development."

Outline Planning Permission (ref. 17/12461/OUT) was granted for: **"Hybrid planning application: 'full application' for change of use and some extension/alteration of Tottenham House and grounds to residential use (C3 use) from educational use (C2 residential institution) and ancillary leisure development, related staff accommodation, and associated landscape works; 'outline application' for outlying related family houses and further related staff accommodation"** on 7 December 2018.

Listed Building Consent (ref. 18/00195/LBC) was granted for: **"Repairs and some extension/alteration to Tottenham House, The Old Stables, the Octagonal Pavilion and other outbuildings and garden walls within the curtilage of Tottenham House, to facilitate re-use as a country house and estate"** on 14 June 2018.

Applications for Non-Material Amendments (ref. PL/2021/07105) and Listed Building Consent (ref. PL/2021/06903) were approved in March 2022 for: **"Internal and external alterations, reconfiguration, restoration and refurbishment throughout the Old Stables block, including restoration of the stonework and chimneys; restoration of rainwater goods; restoration of doors and staircases; restoration of other internal elements and finishes; restoration and**

upgrading of the ground floor level structure; removal of unoriginal openings; reinstatement of original openings; reinstatement of original floorings; reinstatement of the original internal layouts; reinstatement and upgrading of the first floor level structure; opening up first floor level ceilings; rebuilding of the clock tower and timber roof; installation of new windows and doors; installation of domestic services; and other associated and ancillary works". The rebuilding of the clocktower was approved by these applications.

Applications for Non-Material Amendments (ref. PL/2024/02052) and Listed Building Consent (ref. PL/2024/02034) were approved on 02 September 2024 for the following: **"To the Old Stables (Building 2 on the approved masterplan): Internal and external alterations reconfiguration of room layouts including opening up works and the installation of partition walls, proposed changes of use, the creation of a double height space, consolidation of bat lofts, adjustments to SVP positions, removal and restoration of identified historic internal elements and finishes, reconfiguration of a staircase, and other associated and ancillary works. To the Garages (Building 30 on the approved masterplan): the reconfiguration of layouts and the installation of an air exhaust well and other associated and ancillary works."**

A Non-Material Amendment application(ref. PL/2025/06624) application and Listed Building Consent (ref. PL/2025/06621) were approved on 12 September 2025 at the Old Stables for: **"To the interior of the Old Stables basement: Removal and replacement of existing internal staircase; installation of waterproofing including a cavity drain system, insulation and drylining; installation of wall and floor finishes, localised removal and repair of brickwork; installation of brick walls; and associated works. To the exterior of the Old Stables basement: Adjustment to the approved external basement staircase including additional treads; the installation of a sump pump, and associated works."**

There is currently a Non-Material Amendment and associated Listed Building Consent application pending for the following: **"To the First Floor of the Old Stables: Reconfiguration of corner room layouts; consolidation, filling and venting of F21 fireplace; removal of G23 chimney breast; reconfiguration of G24 chimney breast; and associated works."**

A Section 73 application (ref. PL/2024/09312) and associated Listed Building Consent (ref. PL/2024/09243) are pending determination to adjust the wider masterplan in line with the Owner's aspirations and requirements.

Relevant Condition Discharges

Since the owner purchased the Estate, a number of approval of details applications to discharge conditions attached to the extant Outline Planning Permission (ref. 17/12461/OUT) and Listed Building Consent (ref. 18/00195/LBC) have been approved including at the Old Stables.

On 09 July 2021, an approval of details application (ref. PL/2021/04490) was approved in respect of the submission of a revised and updated condition survey of the Old Stables, which was required to inform the refurbishment works moving forward. This condition survey confirmed that the majority of the Ground Floor rooms retain elements (albeit in very poor condition) of original finishes, all of which are much degraded by water ingress and associated damage. The condition survey further confirmed that the majority of the original ground floor flagstones, setts and brick pavements were in-situ, albeit they were all in poor to very poor condition.

An approval of details application (ref. 21/01878/LBDC) was approved on 01 June 2021 and subsequently updated on 15 July 2021 in respect of the lifting of the Ground Floor finishes. The approved works related to the recording and careful removal of historic flagstone flooring,

brick pavements and stone setts within the Old Stables to facilitate the installation of new limecrete and concrete floor slabs and the structural service trench, in addition to the removal of modern concrete floor finishes. The submission noted that all removed flagstone/brick pavement/stone setts will be retained and archived for potential refitting if their condition allowed. Floor finishes considered to be salvageable were proposed to be reused either in their original location or elsewhere in the building or within the landscaping scheme for surrounding areas (subject to the final requirements for flooring).

An approval of details application (ref. PL/2023/08567) was granted on 28 March 2025 for details of floor finishes at First Floor of the Old Stables. The Decision Notice confirms that the proposed floor finishes are considered to be acceptable to facilitate the reinstatement and future use of the building.

An approval of details application (ref. 21/02202/DOC) was granted on 06 May 2021 for details of external doors and windows, including the installation of new external thresholds.

The substructure slabs i.e., the limecrete and concrete slab system across the Ground Floor were most recently approved by Non-Material Amendment (ref. PL/2024/02052) and Listed Building Consent (ref. PL/2024/02034) applications.

Heritage Legislation

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require Local Planning Authorities to have special regard to the desirability of preserving listed buildings, or its setting, or any features of special architecture and historic interest which it possesses, when determining applications for Listed Building Consent and Full Planning Permission, respectively.

Planning Guidance

Paragraph 212 of the National Planning Policy Framework ('NPPF') requires 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Notably, 'conservation' is defined by the NPPF as "the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance".

Paragraph 213 of the NPPF continues that, inter alia, "any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

Given that harm will inevitably arise in repairing and re-using designated heritage assets, to sustain their long term future and heritage significance, including through meeting planning policy, design requirements and achieving relevant standards, the objectives of the statutory duties are applied in context of and association with the established balancing of harm verses benefits, set out within established NPPF policy (Paragraph 215).

The Government is in the process of consulting on an updated version of the NPPF. This DRAFT consultation adjusts the wording applied to heritage harm from 'less than substantial,' 'substantial' and 'total loss,' to 'positive effect,' 'harm,' 'substantial harm,' and total loss (Policy HE6 Paragraph 1). Notwithstanding this, Policy HE6 (Paragraph 3) still allows for the balancing of harm to the significance of a designated heritage asset against public benefits. Important public benefits are listed as securing the long-term re-use of a vacant or underutilised listed building.

Conditions for Discharge

The Applicant is seeking to partially discharge Condition 20 attached to the aforementioned Listed Building Consent (ref. 18/00195/LBC), which, in full, states the following:

Condition 20 (Floors)

“Notwithstanding the general details shown within the Condition Survey and Schedule of Works Reports Vol I-V and VIII (updated) and IX the presumption should be in favour of retaining all historic floors (including floorboards and flagstones) in situ. Prior to the commencement of any works for the lifting, removal or replacement of any historic floors or floor finishes (other than where these have previously been agreed for removal as part of dry rot fabric removals or under condition 5) within any of the individual buildings or structures referred to in 1.1 to the Listed Building Justification and Work Methodology Statement, a schedule of proposals for the storage, treatment, reinstatement and making good of the floors shall be submitted to and approved in writing by the Local Planning Authority. As appropriate this shall include:

- a) a methodology for the lifting, retention and storage of floor boards. Final details of the proposed areas to be lifted. Details of proposals for their reinstatement;**
- b) a methodology for the lifting, retention and storage of flagstones. Final details of the proposed areas to be lifted. Details of proposals for their reinstatement;**
- c) a detailed specification for proposed limecrete floors;**
- d) detailed specifications from appropriate specialist contractors for the repair and restoration of specialist floor finishes including parquet, marble, marquetry;**
- e) details of any proposed new or replacement floor finishes.**

The works shall be carried out in accordance with the approved details.”

Pre-Application Discussions

Extensive pre-application discussions have been held on both the principle and the detail of the proposed Ground Floor Floor Finishes. An initial pre-application meeting was held in May 2025 with further discussions held throughout 2025 where Officers requested that the proposals better reflect the historic hierarchy of finishes across the building.

As part of the pre-application discussions the rationale for the installation of new finishes in the following areas was discussed and agreed in principle with Officers:

- The installation of marble in bathrooms and the hammam for functionality reasons and the installation of tiled finishes in the catering kitchen due to health and hygiene reasons;
- That there was no requirement to lay the floors to fall (as had been the case historically due to the building’s use as a stable block) as this could preclude the functional use of the building as ancillary guest accommodation;

- The rooms in the Western Range are to be the most faithfully restored on a like-for-like basis where possible as these rooms i.e., G06, G07 and G08 are understood to be the most historically significant areas of the building previously being occupied as stabling for the horses of the lady and master of the house;
- That it is more appropriate to consolidate historic finishes than a limited and piecemeal reinstallation over a large number of rooms; and
- Overcladding in certain areas may be supported where the consequential impacts on other details within the building are able to be minimised and mitigated with the overcladding functioning, in effect, as a protective 'carpet' over the restored and reinstated historic finishes.

Proposals

This approval of details application sets out the appropriate details to satisfy the requirements of and partially discharge Condition 20 attached to Listed Building Consent (ref. 18/00195/LBC) in relation to the Ground Floor Floor Finishes at the Old Stables at Tottenham House and Estate.

In summary, the proposals seek to ensure that the maximum quantum of historic finishes are able to be re-laid and reincorporated into the building whilst achieving the Owner's design intent which more accurately reflects the approved use of the building. This is principally achieved through the installation of a reversible 'carpet' to protect the historic uses in instances where these will not be exposed.

Existing Finishes

Historically, there have been a range of floor finishes at the Old Stables including Yorkstone flags, sarsen setts, brick pavements and modern concrete. The existing floor finishes are clearly set out on Ground Floor Existing Internal Floor Finishes (ref. THB002-ADA-XX-ZZ-DR-A-0477 Rev A), the Existing Ground Floor Images, the Existing Floor Finishes Schedule and the Condition Statement, prepared by ADAM Architecture and submitted in support of this application.

The finishes had been approved to be lifted to allow the installation of subterranean services and to assess their condition under approval of details application (ref. 21/01878/LBDC). The existing floor finishes were lifted by Traditional Stone Restoration Limited and despite best efforts to carefully lift and minimise disruption, the condition of many elements of the existing floor finishes across the ground floor was much worse than the initial visual inspection had shown and as is the case with the brick pavements had largely deteriorated further when lifted in line with the approved conservation methodology. It should be noted that owing to the age, condition and extent of failure and damage of the flooring, including the drainage system and the fact that the majority of the finishes were laid directly over compacted ground, there had been much movement and damage of the floor finishes and the finishes would have required significant intervention and replacement, even if the building were to remain in use for equestrian purposes.

The original floor finishes at ground floor level consisted of a variety of hard-wearing finishes which were laid to fall and suitable for stabling purposes and high levels of daily equestrian use and washing out of the stalls. It is estimated that the falls were generally in the region of 50-90mm. There is one room which was surveyed more accurately by Traditional Stone Restoration Limited when lifting the floor slabs; this being the G09 wash down room in the north-east corner of the Old Stables, which had a fall of 160mm due to its historic use.

It is therefore clear that the existing finishes at the Old Stables:

- Are of varied but largely poor condition owing to the building's extensive decay;
- Comprise, in part, modern or unsalvageable materials such as concrete;

- Have been subject to considerable alterations over time;
- Are of varied often patchwork materials both within and across rooms and ranges;
- Are laid to fall due to the building's previous use as a stable block.

The baseline position from which the Design Team have worked is therefore that all historic finishes have been lifted and their condition assessed due to the significant decay at the Old Stables prior to the building coming into the Applicant's ownership. This has informed whether and where the finishes are re-laid within the building and whether they are overlaid by a 'carpet' to both protect the historic finishes for the future and achieve the design intent for the Owner which more accurately reflects the approved land use at the site i.e., ancillary guest accommodation.

Proposed Approach

Reinstatement of historic finishes

It is proposed to reinstate as many of the historic finishes in their original locations as possible. Where limited quantities of finishes survive, these are proposed to be consolidated into rooms in accordance with conservation guidance. In response to Officers' feedback at pre-application stage and in line with the approach taken with the fit out more generally, the finishes in the Western Range (which is the most significant area of the building) will remain exposed as the final floor layer. In this vein, G01 and G07/G08 are proposed to comprise exposed reinstated Yorkstone flags and G06 is proposed to comprise exposed reinstated stone setts.

In order to balance reinstating as many of the floor finishes as possible and the achievement of floor finishes more appropriate to the approved use of the building, in certain rooms, it is proposed to overlay the historic finishes with a protective, reversible 'carpet.' Details of the overcladding are provided by BLDA Architects. However, in summary, the overlay comprises a Jupiter system which would be laid on a dry granular levelling layer. This layer can be easily removed at a later date leaving no residue or damage to the historic finishes. The overcladding therefore provides a protective layer for the historic finishes to prevent further wear.

Consequently, the following approaches are taken across the building:

- Relaying of historic floor finishes as the final floor layer in G01, G06, G07 and G08;
- Relaying of historic floor finishes and overcladding with a protective, reversible 'carpet'; and
- Installation of new finishes to for functional reasons such as the Catering Kitchen.

Levels

As set out above, it is understood that the rooms across the ground floor were typically laid to a fall in the region of 50-90mm with some greater falls in rooms such as the G09 wash down room. When designing the proposed approach to floor finishes, the lowest point of the old floor has been taken as an approximate reference datum at which to reinstate the finishes on this basis. The Design Team have worked hard to design the overcladding as efficiently as possible and within the depth of the historic falls i.e., at a depth of 90mm in the overlay areas.

The historic finishes are therefore proposed to be reinstated largely in their original room locations throughout the building, albeit at a very slightly lower level, with new finishes set largely at the original floor finish level. The exception to this is where the historic finishes are proposed to remain exposed such as G01, G06, G07 and G08 where the finishes will be laid at the historic floor level. The rooms where the finishes are proposed to be laid at a lower level are clearly marked on the Ground Floor Proposed Internal Floor Finishes - Underlay Finishes (ref. THB002-ADA-XX-ZZ-DR-A-0478 Rev C).

Impacts on thresholds, skirtings, doors and fireplaces

It has been approved by condition discharge for the external thresholds at the Old Stables to be new. This approach has not changed, and the new external thresholds are proposed to be reinstated at existing levels. If the overcladding 'carpet' were removed at a later date, this would result in a nominal 90mm step down from the external thresholds. It is considered that this is the minimum step down required to support the installation of the 'carpet,' that this is within a suitable tolerance for restored buildings of this kind and is reflective of the historic position.

In the case of internal thresholds, there are two scenarios:

1. Where the existing threshold forms a transition between a space with no overlay and one with overlay, the overlay will be laid to be level with or just below the existing historic threshold level. If the overlay is later removed there will be a nominal 90mm change in level between the threshold and the historic floor
2. In the case of an overlay either side of the historic retained threshold, the threshold would remain installed level with the historic finishes. The overlay would be installed over the historic threshold with a new stone threshold replicating that below.

In the case of skirtings, there are two scenarios:

1. Stone skirtings: these are replacements to the historic profile and will be installed with the top edge at the historic level. They will be made 90mm taller so that the bottom edge is set at the revised historic floor level. The overlay will be laid up to the skirting.
2. Timber skirtings: these are replacements to the historic profile and will be installed with the top edge at the historic level. The bottom edge will be set such that the overlay tucks underneath it. In the event of the overlay being removed an extension piece of the same thickness will be fitted to the bottom edge and the whole skirting refinished to blend in the horizontal joint.

The fireplaces will be installed such that the hearth stone is flush with the overlay floor finish. If the overlay floor is removed, then the hearth stone edge will be 90mm high in relation to the historic floor level beneath and be thick enough to allow the historic floor to finish against the hearth stone vertical edge.

All fixings will be arranged to coincide with brick mortar joints to minimize damage to the historic brickwork.

The proposed approach does not have any impacts on doors – either new or reinstated.

Floor build ups

The Ground Floor slabs were approved under Non-Material Amendment (ref. PL/2024/02052) and Listed Building Consent (ref. PL/2024/02034) applications and are a hybrid system of both limecrete and concrete slabs. The majority of the substructure is limecrete with the exception of the catering kitchen and hammam which is installed above concrete.

The Design Team have reviewed the slabs on site and their ability to deliver the proposed floor finishes. It has been identified that the existing limecrete slabs are quite thin at only 100mm thick. They are now cracked through in numerous places due to shrinkage cracking and stress cracking from corners and floor boxes. As constructed, these slabs are unsuitable to receive the historic finishes without risk of cracking during service and are unable to accommodate the design loading requirements of 2.5KN/sqm. As an aside, they have also been installed too high to receive the

thickness of the proposed historic finishes with only 30mm from slab to finish level and as such, would have to be removed in any case.

In addition, the external walls of the Old Stables are in direct contact with the ground which presents a greater risk of rising damp within the walls and there is no practical way to insert an effective damp proof course without extensive intervention which has been discounted on heritage grounds. It is considered by the Design Team that the use of limecrete will not necessarily prevent rising damp within the footings of the external walls and the BLDA Justification Statement appends two research papers to this effect.

Various alternative solutions have been reviewed by the Design Team including the installation of a Reinforced Concrete (RC) slab. However, this would be too thick to both reinstate the historic finishes and any proposed overcladding without either increased excavation or implications for levels.

It is therefore proposed to remove the limecrete on site whilst retaining the Glapor system that sits underneath. A Damp Proof Membrane and a Screed Replacement Til (SRT) system will then be placed over the top. The proposed floor build ups (which includes the proposed replacement of limecrete) have been designed to have a vapour permeable strip around the edges to relieve any upwards vapour pressure due to the risk of damp as set out above. The proposals are clearly set out on G401.1 Ground Floor Plan - Floor Build Ups prepared by BLDA Architects.

The historic floor finishes will be re-laid to either remain exposed or to be covered by the protective 'carpet.' BLDA have cited research confirming the appropriateness of this approach, as well as a number of listed buildings where this system has been successfully incorporated into the floor build ups including:

- St Paul's Church in Chippenham (Grade II*);
- Church of St Mary de Crypt in Gloucester (Grade I);
- St Michael's and All Angels in Berwick (Grade I);
- St Mildred's Church in Tenterden (Grade I); and
- St Edward's Church in Stow on the Wold (Grade I).

Public Benefits vs Heritage Harm

Whilst the Design Team have sought to ensure that impact on the special historic interest and architectural significance of the building is minimised as far as possible, the proposals are considered to result in some 'less than substantial' harm to heritage significance (in adopted NPPF terms) and some 'harm' to heritage significance (in emerging NPPF terms).

The less than substantial harm caused by the use of an overcladding 'carpet' to the character of the building is considered to be both temporary and reversible, and mitigated in part through the exposure of historic finishes in specified rooms. The use of the overcladding further allows for the installation of a greater quantity of historic finishes where these are no longer in sufficient condition or of appropriate materiality to remain as final exposed finishes. The use of the overcladding therefore supports the wider restoration, and future protection, of the historic finishes at the Site.

The less than substantial harm caused by the adjustments to finished floor levels is considered to be a regrettable but unavoidable consequence of the proposed overcladding. The floor build ups have been designed to fit within the tolerance of the historic floor levels and have been designed as the minimum, functional thickness of the overcladding. If and when removed in future to expose the historic finishes, it is considered that a nominal stepdown of 90mm is acceptable when considering the historic position at the Site.

In both cases, the less than substantial harm is considered to be outweighed by the public benefits of the wider restoration of the Grade II* listed building which currently remains on Historic England's 'Risk Register' as being "most at risk of becoming lost as a result of neglect, decay or inappropriate development." The proposed Ground Floor Floor Finishes therefore contribute to achieving the building's approved and optimum viable use as ancillary guest accommodation to the Main House.

Summary

The proposals seek to reinstate as many of the historic floor finishes in their original locations as possible. Where these historic floor finishes are no longer considered appropriate to the approved use of the building, it is proposed to overclad these with a protective and reversible 'carpet.'

The proposals seek to strike a balance between the reinstatement or replication of existing/historic position and Client preferences, noting that the approved use of the Old Stables is as ancillary guest accommodation to the Main House, rather than as an equestrian facility as was historically the case.

The realisation of the consented re-use of the Old Stables, to its optimum viable use, requires appropriate flooring materials for that use. A balance is being struck in repair and restoration (where practical), new traditional materials, and new, use-function specific materials to enable the proper functioning of the repaired building.

It is therefore considered that the proposals are a contemporary evolution of the Old Stables (Building 2 on the approved masterplan), which actively retain the majority of the original surviving core fabric, along with some reinstatement of original fabric combined with new elements to match and other new finishes, that will assist with facilitating the maintaining and restoring of the external appearance of this heritage asset for future generations.

These proposals further showcase the careful and responsible stewardship of the Owner and the significant financial investment that they are willing to commit to the restoration of a building on the Historic England Heritage Risk Register, and the wider Estate. Whilst also retaining as much of the of the original remaining historic listed fabric as possible. The proposals are considered appropriate for the essential restoration of this significantly decayed building.

Accordingly, we enclose the relevant details to partially discharge Condition 20 attached to Listed Building Consent (ref. 18/00195/LBC) in relation to the Ground Floor Floor Finishes at the Old Stables at Tottenham House and Estate for your formal approval.

Application Documentation

In accordance with the validation requirements of Wiltshire Council, alongside this Covering Letter, we enclose the following documentation to partially discharge these aforementioned conditions:

- Application Forms submitted via the Planning Portal;

ADAM Architecture

- ADAM Architecture Condition Statement;
- 6150 Stables - Existing Floor Finishes;
- Existing Ground Floor Finishes Images (ref. 6150_CE-119);
- External Door Threshold (ref. THB002-ADA-XX-00-DR-A-515);

- Ground Floor Existing Internal Floor Finishes (ref. THB002-ADA-XX-ZZ-DR-A-0477 Rev A);
- Ground Floor Proposed Internal Floor Finishes - Underlay Finishes (ref. THB002-ADA-XX-ZZ-DR-A-0478 Rev C);
- Ground Floor Proposed Internal Floor Finishes - Overlay Finishes (ref. THB002-ADA-XX-ZZ-DR-A-0479 Rev B); and
- Stable Pallets Legend.

BLDA Architects

- BLDA Justification Statement Rev C;
- 240 Ground Floor Build Ups Rev 01; and
- G401.1 Ground Floor Plan - Floor Build Ups.

Summary

This approval of details application has been submitted via the Planning Portal as detailed above. As this application relates to a Listed Building Consent, there is no fee required to be paid by the Applicant.

We look forward to confirmation of the registration and subsequent validation of this approval of details application shortly.

In the meantime, should you have any queries, please do not hesitate to contact Graham Oliver or Hannah Davies of this office.

Yours faithfully,



Newmark