

REFERENCE PLANNING APPLICATION PL/2026/00819. RADNOR HOUSE, DOWNTON.

Please connect to my website objection comments sent Wednesday, 4 Mar 26 at approx 1200hrs.

I wish to make the following comments:

DESIGN AND ACCESS/HERITAGE STATEMENT

The Application's Design and Access/ Heritage Statement states, "there is a large car dealership to the South of the property and a residential bungalow to the East, whilst there are roads to the North and West (The Borough and Headlands)". The statement does not mention that to the North there is a public footpath/bridleway, an end terrace cottage and two private houses (3 The Headlands, 2 The Borough and Pitt House). All these properties have windows which face towards, and are visible from, the proposed building. Please see photo 1.

The Access/ Heritage Statement also states, "The residential property to the East will notice the raised roof but as it will be used as ancillary accommodation with occasional use for the likes of a gym and games room it is not thought this will be detrimental to the occupiers". This trivialises the impact it will have. The proposed building will dominate, overshadow and overlook the West side of the bungalow including its entrance porch and front door. Please see photo 2.

The Access/ Heritage Statement also concludes that, "the raising of the roof line and works or repair and restoration will have minimal impact upon surrounding properties or the conservation area." A site visit will confirm that this is not the case.

DESCRIPTION OF THE PROPERTY

The statement includes, "In recent years, the building has been repaired by the current owners and new access doors have been introduced to the North elevation". The statement refers to Planning Application PL/2025/09547. This relates to a different property and gives no background to the conversion of the outbuilding into a garage.

PROPOSAL

The current outbuilding is low and unobtrusive. It can barely be seen from the footpath, and its visual impact is minimal. It leaves an open aspect which is likely to have been present for a century or more. It is difficult to see how the addition of a first floor can possibly enhance the conservation area or listed setting.

Raising the wall plate by 1.2m and constructing a roof with dormer windows will have a dominating effect and it will compromise the privacy currently afforded to neighbouring properties. Its dormer windows will look directly over the bungalow to the East and allow a view into its rooms and entrance. They will also view directly into windows of 2 The Borough and Pitt House.

The proposed building will block a comparatively small but significant portion of the sky currently enjoyed by 2 & 6 The Borough and the conservation area in general.

NEIGHBOURHOOD PLAN

Within the Wiltshire planning framework, the Downton Neighbourhood Plan makes particular note of the Downton Conservation Area. It includes reference to the surrounding landscape which is, "noticeably visible from within Downton....There are also views from the wide Borough of the downs on both sides above the village and there are views from either side of the village of the opposite valley sides leading up to the surrounding Downs. There are important views of the village, its roof-scapes and the mature treed landscape. Among the key characteristics of the Downton

Conservation area are distant glimpses of buildings in a mature tree covered landscape and the importance of roofscapes in local views....”

The Plan goes on to state that, ‘the settlement pattern and plan, particularly that of the Borough, has seen limited change since inception and its survival should be regarded as highly significant in any proposals for development.”

The Conservation Area Appraisal and Management Plan confirms the District Council’s and the Parish Council’s intention is to safeguard the area’s special qualities, and takes the view that it is, “the accumulation of an area’s positive architectural or historic attributes, rather than the quality of its individual buildings, which makes it worthy of conservation status.” It goes on to state that, “the attributes might include the landscape setting of the area, the grouping of traditional buildings and the resultant sense of spaces and sense of enclosure, the scale design and type of materials,... historic boundaries, public realm, landmarks views and vistas, and the present and former pattern of activities and land use.”

Several of my objections to this Application fall out of the Neighbourhood Plan.

THE EFFECT ON NEIGHBOURING PROPERTIES AND AREA

The proposed building will be a dominating feature in the conservation area and will be clearly visible from the A338, the Borough footpath and neighbouring properties. Please see photo 3.

The windows of the proposed building will offer a direct view into bedrooms, hallway, lounge, kitchen and dining room of 2 The Borough. They will also compromise the privacy afforded to 3 The Headlands, Pitt House and No 6 The Borough. Please see photos 4, 5 & 6.

As a games room, the proposal will introduce noise & disturbance in addition to that already experienced by the owner carrying out engineering work and running car engines in the garage late into the evening. As ancillary accommodation, it could be used for living accommodation and be even more intrusive.

ECOLOGY

Sunlight is at a premium to properties in this area. The proposed building will block what is currently a clear view of a portion of sky. This will reduce light reaching the properties to the North and East and will be particularly significant during the winter months. Furthermore, as incoming solar radiation contributes significantly to the heating of 2 The Borough, it is likely to increase electricity consumption and heating costs in winter.

I understand that the Right to Light is a legal entitlement that allows property owners to receive natural light through windows or other openings. If a property has enjoyed uninterrupted light for at least 20 years, this right becomes legally protected under common law and the Prescription Act 1832. This right is essential for maintaining a comfortable living environment, preserving property values, and safeguarding occupants’ well-being. I believe that 6 The Borough has enjoyed light for over 50 years and 2 The Borough and Pitt House have enjoyed uninterrupted light for over 100 years.

The large tree on the Eastern edge of the Radnor House garden is an undeniable asset and will offer some screening to Pitt House and one window of 2 The Borough when in leaf. However, it will not provide screening for around half the year when its leaves have dropped.

The outbuilding roof is a classic location for bats to nest. The proposed building will remove that potential, and I trust that this has been checked by an appropriate agency.

LOSS OF AMENITY/PRIVACY

The proposed building will block a significant portion of an already small view from 2 The Borough which, with windows only facing south, already has only a very narrow vista and view of the sky. This is the only horizontal view from the house, and it therefore makes a significant contribution to the amenity of the property, and its loss would have a serious, adverse impact on this amenity. Please see photos 7 & 8.

The proposed building will allow a direct view into private rooms of neighbouring properties, in particular, 2 The Borough will have bedrooms, sitting room, upstairs hallway, kitchen/diner and outside spaces all visible. It will remove any privacy from the front and side of 6 The Borough and will overshadow the entrance.

When 2 The Borough was converted, it was specifically designed so that windows did not view into neighbouring properties and compromise their privacy. To regain privacy, 2 The Borough will be obliged to cover windows with shutters, blinds, or opaque glass, thereby reducing incoming light and darkening the home to an unacceptable level. This will lead to increased reliance on artificial lighting, higher energy costs, and a diminished quality of life. It will reduce residential amenity, compromise wellbeing and the peaceful enjoyment of the property.

PLANNING CONSENT FOR 2 THE BOROUGH

By way of background and a reminder of the planning constraints already applied to this part of the conservation area, the permissions for conversion of 2 The Borough included the following: “no window, dormer window or rooflight, other than those shown on the approved plans, shall be inserted in the roofslopes of the development. REASON: In the interests of residential amenity and privacy”.

Other conditions were also applied for the following reasons: “In the interests of visual amenity and the character and appearance of the area.” and “In the interests of preserving the character and appearance of the listed building and its setting” (ie Radnor House).

The Case Officer’s report made particular mention of the ***Character of the area as follows:*** “A Wiltshire Council Conservation Officer has expressed some concerns over the submitted scheme for a single two-bedroom dwelling resulting from the conversion of the historic asset and has provided the following consultation response: *“In the course of earlier communications about the conversion of this building, we have been keen to retain the building and to retain its simple ancillary character. The current proposal, if implemented, would in my view, significantly erode that simple character. I particularly object to the 3 dormers which are very suburban/domestic in appearance and the two large, paired windows on the single storey (south elevation)”*.

2 The Borough had existing windows facing North and West towards neighbouring dwellings. As part of the application, one of these windows (west) was to be sealed up ‘to benefit neighbouring privacy, with the other (east) being proposed to be obscure glazed. Also, an existing rear 1st floor window (which looked toward the rear neighbours) was proposed to be obscure glazed to remove existing overlooking towards the rear neighbouring gardens’. This window was bricked up.

OBJECTIONS TO PLANNING APPLICATION PL-2026-00819

I therefore state my objection to the planning application for the following reasons:

1. Its visual impact will have an adverse effect on the residential amenity of the neighbouring properties and on the character and appearance of the Conservation Area.
2. It will lead to a loss of the open aspect and will alter the character of the neighbourhood and the Conservation Area.
3. It will compromise the privacy of neighbouring properties and will look directly into almost all rooms of 2 The Borough. This will cause a substantial loss of privacy.
4. It will block a significant portion of the only horizontal view from 2 The Borough. This view makes a significant contribution to the amenity of the property, and its loss would have a serious adverse impact on this amenity.
5. It will variously compromise the sense of space, reduce views and vistas, overshadow, overlook, challenge the right to light, reduce residential amenity, invade privacy, compromise wellbeing, and inhibit the peaceful enjoyment of neighbouring properties.
6. The proposal does not sit well with the Neighbourhood Plan, especially for the Conservation Area.
7. It is not in an area scheduled for development and introduces the risk of creating a development precedent for future conversion.
8. Heritage & Conservation – the proposed building is unattractive, somewhat suburban, and it will damage the character of the listed building and conservation area, and will be visible from the A338 road, the Borough footpath and all neighbouring properties.
9. It will create noise and disturbance at unpredictable times of day and night.
10. It will be overbearing compared with the neighbouring properties and will be an over-development of the site.
11. There will be a loss of habitat currently afforded by the open nature of the garage roof space assuming bats are not already in place.
12. On principle - the very nature of the proposal is inappropriate, visually disruptive and intrusive to the conservation area and damages amenity.

KM Emmerson

4 March 2026

Annex: Photographs 1 to 8:



Photo 1. View from edge of current outbuilding looking North towards 3 The Headlands, 2 The Borough and Pitt House.



Photo 2. The front entrance and driveway to No 6 The Borough showing the proximity and position of the current outbuilding.



Photo 3. View from the Headlands and A338. The proposed building will fill that portion of sky between the tree to the left and the house, almost to the height of Radnor House.



Photo 4. View from main bedroom. 2 The Borough.



Photo 5. View from guest bedroom. 2 The Borough.



Photo 6. View from Stairs/landing of 2 The Borough looking towards the proposed building. The current outbuilding roof apex is visible in the right skylight. The windows will look directly into the landing area.



Photo 7. View from the sitting room 2 The Borough. The proposed building's windows will be visible directly above the wall. The current outbuilding roof apex is just above the wall. The building block the left half of the sky view.



Photo 8. The view from the kitchen/dining area, 2 The Borough. The proposed building will be centred on the apex of the outbuilding (visible in the top, 3rd pane). Its windows will be above the wall and look directly into the room. The building will block the view of the sky. Note, the view is already marred by an incongruous shed/shelter which has been built in the garden of Radnor House.