

Wiltshire Council Planning Consultation Response

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(South/West)

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Officer's Title: Planning Officer

Application No: **PL/2026/00954 LBC and PL/2026/00819**
Radnor House, The Headlands, Downton, Salisbury, SP5 3HJ
Alterations to outbuilding to provide ancillary accommodation at first floor level

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

Recommendations:

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

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

Policy:

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

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

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-16 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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

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

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

The following points are taken from the Historic England document "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

"The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset."

"The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part..."

"While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time."

"The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance."

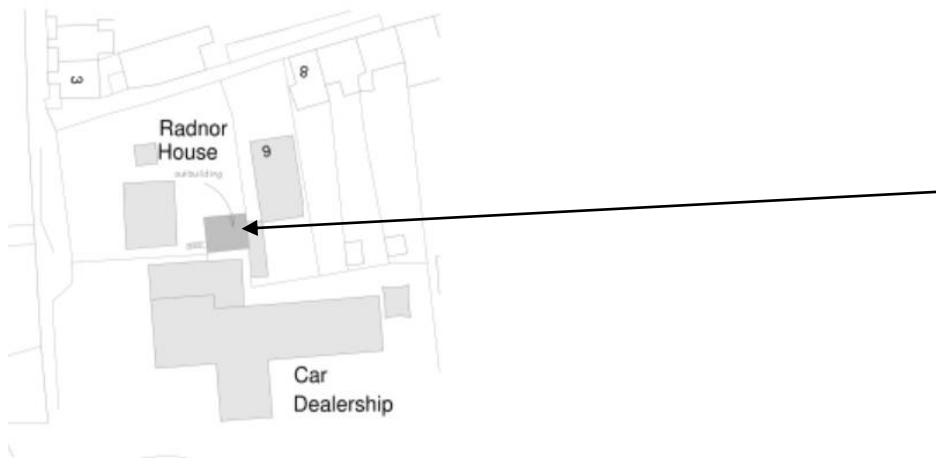
Site and assets considered:

Radnor House is a grade II listed building. The list entry reads as follows:

'Wrongly shown on O.S. map as Radnor Close. Detached house. Third quarter C18. Flemish bond brick, tiled roof with gable-end brick stacks. 2-span roof. 2-storey, 3-window front. Central 6-panelled door with fanlight in beaded case, semi-circular hood on brackets, 3-light casement to either side with cambered flat arches. First floor has three 2-light casements. Dentilled eaves. Right return has cast-iron casement to right and two small leaded lights to left, lighting inglenook fireplace. Rear has C20 porch and 3-light casement to ground floor, four 2-light casements to first floor. Interior has 4-panelled doors in moulded architraves to front range, rear range contains stairs and planked doors with strap hinges.. Stone with number 18 on front, from 1784 survey. (Unpublished records of RCHM (England), Salisbury).'

To note: structures within the curtilage of a listed building, that pre-date July 1948 and are ancillary to the house, may be considered 'curtilage listed'.

In respect of the existing outbuilding, the subject of this application, the D&A&Heritage statement notes that *'The structure is predominantly painted blockwork with some original brickwork in the west wall which has a doorway and window'.....*



The house is also within the Downton Conservation Area, for which there is an adopted appraisal.

Proposal:

Alterations to outbuilding to provide ancillary accommodation at first floor level involving:

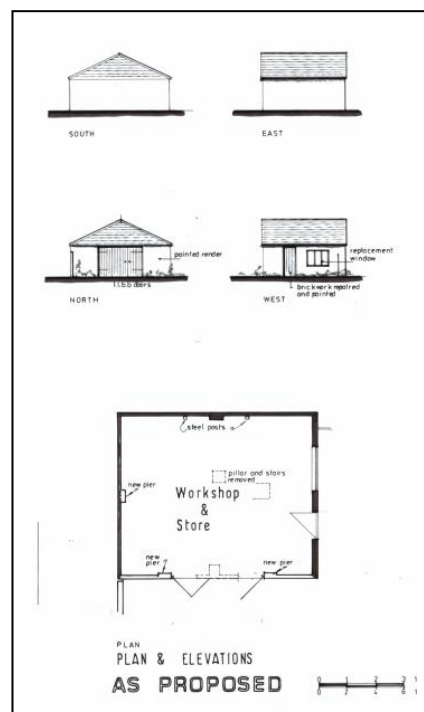
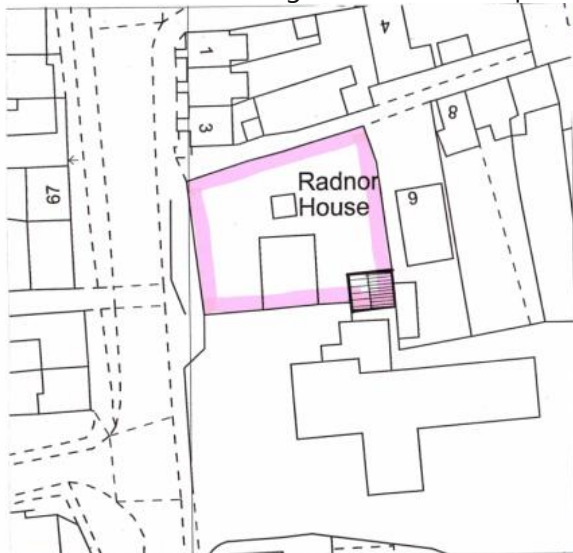
- Removing existing roof
- Raise the wall plate height by approximately 1.2m
- Construct a new roof with dormer windows x2
- New external space

The D&A/Heritage statement says that *'the historic west wall will be retained an only modern fabric will be affected by these changes'*.

Relevant planning history:

PL/2021/04905 and PL/2021/04906

Alterations to outbuilding to form workshop/store



6.19 of the heritage report accompanying the 2021 applications said:

'Alterations to the barn should seek to preserve the historic west wall'

In my response I said:

The application is supported by a heritage assessment (seems to be extracted from a larger document) which is welcomed. The extract notes that the structure is much altered/modern walling but that the west wall is original brickwork and the south wall is also old but painted.

The proposal is to insert large doors into the north elevation and replace the windows in the west elevation. I have no objection to the proposals which would not affect historic fabric, such that remains.

Issues:

The issue is the impact on the interest of a curtilage listed structure, the setting of the listed Radnor House and the impact on the Downton conservation area.

Information considered/provided

Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance.

In this case, whilst the applications are accompanied by a "Design, Access and Heritage Statement" the document provides limited information about the building and fails to provide any objective assessment of the significance of the outbuilding, nor its contribution to the setting of the house. However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting (as appropriate)

The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

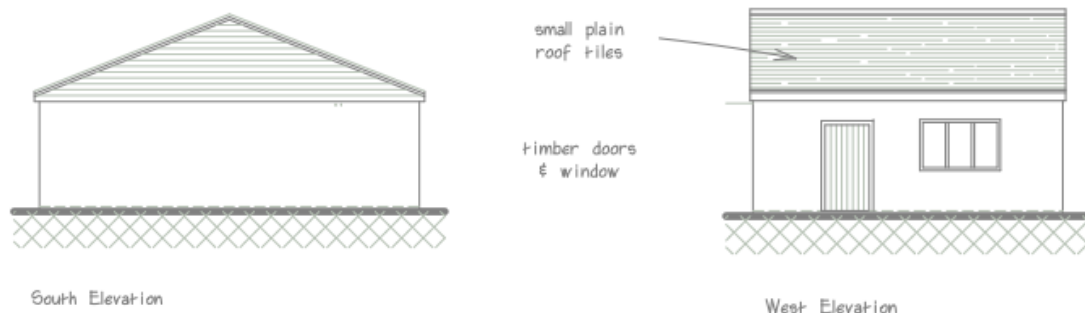
Insofar as it relates to this application, the significance of the outbuilding is limited. It carries some evidential significance (an original brick south and west wall) which contributes to an understanding that the main house was once served by a series of contemporaneous outbuildings. The scale of the existing building ie being single-storey, also serves to underline its ancillary character.

In terms of the impact on the setting of Radnor House, the current structure has a neutral impact in view of the fact that it appears to be a modern structure (three walls and a shallow pitched roof) and has limited openings.

Assessment:

From a previous heritage statement:

'the west wall is original brickwork and the south wall is also old but painted'



Proposed south and west



The statement does not say that the existing south wall will be retained. I recommend the agent is asked to clarify the impact of the proposals on this elevation which contains historic fabric.

In order to keep the height down, the building has an element of a flat roof, as well as quarter hips to reduce the bulk – a regrettable non-traditional detail.

Despite this detailing, the building will be considerably bulkier than the existing. There is no assessment of its impact on the setting of the house in the heritage statement but I consider it would cause some harm given its close proximity, demonstrated in the photo from the heritage statement.



In terms of proposed features, I would recommend that the rooflight is a conservation style one (recessed). The proposed door, being fully glazed, is not traditional in character but I assume they want more light. I would recommend that they consider a wooden ledge and brace door with an inner glazed door.

Summary & conclusion:

The NPPF confirms 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). **It makes clear that any harm to a designated heritage asset requires clear and convincing justification.**

The existing building is of limited interest. However, the proposals will result in some further diminishing of its interest through the loss of historic brickwork (south elevation). I also question whether it is indeed possible to retain the historic west elevation brickwork in view of the likely lack of foundations and to construct an additional storey on top. A structural engineer's report has not been submitted in support of the proposals. I would suggest that one is necessary in view of the stated intention to retain the existing west elevation.

In respect of the setting of Radnor House, I consider that the increased scale and massing will also cause some harm in view of the close proximity. In terms of the conservation area, the legislative requirements are that it 'preserves or enhances' the character of the CA. I consider the proposals would 'preserve' the CA.

In conclusion, I consider the proposals would cause some harm to the existing structure, albeit slight, but harm also to the setting of Radnor House in view of its proposed scale and massing. I am sceptical that the remaining historic fabric within the existing outbuilding can be retained.

If you are minded to approlloving conditions:

Conservation style rooflights set flush with the roof
Approval of the clay tiles for the roof
Cladding to remain unstained

Greater details of the proposed dormers at 1:20.