

Hayley Clark, Planning Officer
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

13 March 2026
Council Ref: PL/2026/00342
PL/2026/00416
Our Ref: W2762

Dear Hayley,

Re: Response to Historic England and Conservation Officer Comments on Applications PL/2026/00342 and PL/2026/00416 – Conholt Park, Conholt Lane, Conholt, Andover, SP11 9HA

INTRODUCTION AND PURPOSE OF THE ADDENDUM

This addendum responds to the consultation responses of Historic England and Wiltshire Council's Conservation Officer on applications **PL/2026/00342** (*Retention of a Staff Car Park (Retrospective)*) and **PL/2026/00416** (*Retention of an existing exit roadway connecting the Main Working Access to Middle Access (Retrospective)*).

It provides additional clarification on significance, impact, and heritage planning balance, and has been informed by the *Conholt Park: Assessment of the Historic Designed Landscape (February 2024)* prepared by Dr Kate Feluś as well as relevant Historic England guidance (including GPA2, GPA3 and HEAN12) and the applicable national and local planning policy context. It also addresses how the applications comply with the NPPF paragraphs identified by Historic England (paragraphs 207, 208, 212, 213 and 215).

Historic England consider the wider Conholt Park landscape to make an important contribution to the setting of the Grade II* listed house. In their response, they conclude that proposals will introduce new development into an area of historic parkland that has remained largely unchanged since at least the 19th century. As a result, they believe the proposal will cause harm to the significance of the Grade II* listed Conholt Park through changes to its historic setting.

In accordance with NPPF paragraphs 207–208, this addendum provides a proportionate, evidence-based description of the significance of the affected heritage assets and the contribution made by their setting, ensuring the decision-maker is sufficiently informed to understand the potential impact of the proposals.

WHALEBACK

This addendum fully assesses the historic significance of the site, establishing clear and convincing justification for any resulting impact of retaining the Exit Road and Staff Car Park on the setting of the Grade II* listed house. It is summarised by a detailed balancing case, demonstrating how the public benefits outweigh any potential harm. Our response responds to the relevant sections of the NPPF identified by Historic England:

NATIONAL PLANNING POLICY FRAMEWORK

Paragraph 207 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. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- **Purpose:** to ensure appropriate and sufficient understanding of significance of a heritage asset as the basis for decision making.

Paragraph 208 requires local planning authorities to understand the significance of any heritage asset that may be affected by a development; whether directly or through its setting. Decision-makers must use appropriate evidence and expertise to assess this significance and should seek to avoid or minimise conflict between conserving the asset and the proposed development.

- **Purpose:** To ensure decisions are informed and that harm is avoided where possible through early understanding of heritage value.

Paragraph 212 establishes that great weight must always be given to the conservation of designated heritage assets when assessing planning applications. The more important the asset, the greater the weight that must be applied. This applies regardless of the scale of harm (substantial, total loss, or less than substantial).

- **Purpose:** To reinforce the statutory duty that heritage conservation is of paramount importance and must be prioritised in all planning decisions.

Paragraph 213 states that any degree of harm to the significance of a designated heritage asset, whether through alteration, demolition, or impacts on its setting, must be supported by a clear and convincing justification.

It also sets thresholds:

- Harm to Grade II listed buildings or registered parks/gardens should be exceptional.
- Harm to the highest significance assets (Grade I, Grade II*, scheduled monuments, etc.) should be wholly exceptional.
- **Purpose:** To ensure that harm is not taken lightly and that stronger justification is required as the importance of the asset increases.

Paragraph 215 States that where a proposal results in less than substantial harm to a designated heritage asset, this harm must be weighed against the public benefits of the scheme. These may include securing the asset's optimum viable use.

- **Purpose:** To ensure that modest levels of heritage harm can only be accepted where outweighed by robust, demonstrable public benefits.

POLICY CONTEXT

Assessment of the heritage implications of the Staff Car Park and Exit Road proposals has been undertaken with reference to the statutory framework, national planning policy, local policy, and established good-practice guidance on the setting of heritage assets. These collectively form the basis against which the original applications were determined and underpin the further clarification provided within this addendum.

Wiltshire Core Strategy

Core Policy 58 of the Wiltshire Core Strategy requires that designated heritage assets and their settings are conserved, and where possible enhanced, in a manner appropriate to their significance. The policy encourages proposals that improve the condition of heritage assets at risk and expects development to be informed by relevant heritage advice and assessments.

National Planning Policy Framework (NPPF)

The NPPF establishes the national approach to conserving and enhancing the historic environment. The paragraphs highlighted by Historic England (208, 212, 213 and 215) collectively require:

- **Understanding significance** before reaching a decision (Paragraphs 207-208).
- **Giving weight** to the conservation of designated heritage assets (Paragraph 212).
- **Clear and convincing justification** for any harm (Paragraph 213), with harm to Grade II* assets expected to be wholly exceptional.
- **Weighing less-than-substantial harm** against public benefits (Paragraph 215).

These principles guide the heritage assessment provided in this addendum.

Planning Practice Guidance (PPG)

The PPG provides further clarification on how the policies of the NPPF should be interpreted, including the requirement to understand the nature of an asset's significance, the contribution made by its setting, and the degree to which proposed change would affect this.

'Significance' is defined as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals

The setting of Heritage Assets (Historic England Guidance)

The setting of a heritage asset is defined within the NPPF as 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, may affect the ability to appreciate that significance or may be neutral.

Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following (GPA3) broad approach to assessment.

- **Step 1:** Identify which heritage assets and their settings are affected;
- **Step 2:** Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm; and
- **Step 5:** Make and document the decision and monitor outcomes

Where a proposed development has the potential to alter the surroundings in which a heritage asset is experienced, it can be considered to affect the asset's setting. As part of the wider programme of development at Conholt Park, Dr Kate Feluś prepared an *Assessment of the Historic Designed Landscape*, which traces the evolution of the landscape and evaluates its significance at local, regional, and national levels. The study was commissioned to inform both the restoration of historic landscape features and the sensitive design of new elements, ensuring that interventions enhance, rather than detract from the setting of the Grade II* listed house.

ASSESSMENT OF SIGNIFICANCE

The development of the estate is defined by its evolution from a 17th-century agricultural farmhouse into a formal mansion, a transformation underpinned by successive phases of high-quality landscape design. Key heritage drivers include the 1720 establishment of the West Park deer park and stables, the mid-18th-century creation of formal gardens and

visually connected Upper Parkland, and the sophisticated 1820s remodelling which introduced the Lady's Walk and sunken fencing to unify the house with its wider setting. Historic England acknowledge that the setting of Conholt Park is of high significance, deriving from the long and complex evolution of its designed landscape and its historic relationship with the Grade II listed house. Although the landscape is not included on the Register of Parks and Gardens, they consider its historic character, coherence, and layered development - evident across areas such as West Park, the Upper Parkland, the Front Park and the formal gardens - to make an important contribution to the appreciation of the house. In particular, the long-established open parkland and historic approach routes are identified as key components of the estate's overall heritage value

The *Assessment of Historic Designed Landscape* report prepared by Dr Kate Feluś provides additional detail on the assessment of significance. The report states: *It is necessary to assess the significance of the designed landscape at Conholt within two different contexts: in terms of national and regional significance and in terms of its importance as the setting of the Grade II* house. These significances provide a benchmark against which decisions on future change and management can be taken.*

Consistent with **NPPF paragraph 208**, the report concludes (in table 4.1) that the Upper Parkland (the zone relevant to the exit-road corridor and the staff car park) holds no external significance (nationally or regionally) and only low contribution as setting to the Grade II* listed house, reflecting the limited designed intent historically evident in the north and west paddocks.

Those areas of landscape with the highest significance as part of the setting of the house are:

- **South Lawn:** Which forms the immediate setting of the house on that side;
- **Stable Yard;** and
- **Front Park:** An area of early nineteenth century parkland, running south from the house, across attractively undulating terrain towards the pre-historic circular enclosure of Bevisbury.

The Staff Car Park and Exit Road remain fully within Upper Parkland and do not physically encroach into the landscape areas that hold greater significance. The report by Kate Feluś concludes correctly that the relationship between the house and the landscape is strong in two vistas – looking south and looking south-west. The relationship between house and setting on the north and west sides is very limited.

ASSESSMENT OF THE EFFECTS OF THE PROPOSALS

In assessing effects on significance, NPPF paragraphs 212 and 213 require great weight to be given to the conservation of designated heritage assets and that any harm - regardless of level - must be supported by a clear and convincing justification.

WHALEBACK

Historic England advises that assessments of setting should identify the effects a development may have on the setting of a heritage asset and then evaluate the degree of harm or benefit to the asset's significance. This can include cumulative impacts.

Because heritage assets and their settings vary widely, Historic England guidance (HEAN12) notes that no single assessment method is appropriate in all cases. Instead, the approach should reflect the specific circumstances of the site and the nature of the proposed change.

In general, the assessment should consider the key attributes of the development:

- Location and siting;
- Form and appearance;
- Wider effects (such as activity, noise, or changes to landscape character); and
- Permanence (whether impacts are temporary or enduring)

Historic England conclude that the proposals will result in additional harm to the significance of Conholt Park, primarily through effects on its historic parkland setting. They note that the Upper Parkland, forming the western setting to the Grade II* listed house, has remained largely unchanged since the 19th century. Introducing an additional drive and areas of car parking into this previously undeveloped part of the parkland would therefore alter its parkland setting through a cumulative impact.

Whilst the Exit Road and Staff Car Park introduce development into an area of the landscape where there has historically been no built intervention, the Upper Parkland has been assessed as making a lower contribution to the significance of the setting of the Grade II* listed house. Its role within the designed landscape is more peripheral, forming part of the wider agricultural and parkland character rather than a principal component of the formal setting.

Crucially, the Car Park is located within an existing pocket of built form associated with the estate's service operations area, and it lies immediately alongside the previously approved staff car park. Its position therefore represents a continuation and consolidation of established operational development, rather than an isolated incursion into open parkland.

Furthermore, this specific area has experienced a period of approximately three decades of declining management and fragmented upkeep. The historical character of this parcel has been notably compromised by its long-standing use for equine grazing, which has introduced an array of non-traditional interventions including utilitarian post-and-rail fencing, modern sheds, and concrete block buildings used for storage. Far from being a pristine or undisturbed landscape, the site has, in recent history, presented as a functional, semi-industrialised service fringe, where the original parkland aesthetic has already been superseded by modern operational requirements.

The developments do not physically sever or isolate the house from its wider landscape. The introduction of hard-surfaced routes and parking into previously undeveloped parts of

WHALEBACK

the Upper Parkland does create subtle fragmentation of the open spatial character. This aligns with the incremental change highlighted by Historic England in their concerns about cumulative impacts on the designed landscape.

Surveyed data within the submitted Transport Statement identifies regular daily vehicle movements (40–50 staff vehicles plus deliveries) utilising the working access routes. Within the Upper Parkland, the narrow width of internal roads (typically 3.6m) results in occasional stopping or passing movements that introduce intermittent activity into the landscape. Establishing a one-way system reduces these moments of conflict and minimises idling or reversing, thereby moderating activity levels within the parkland and reducing the degree of perceptual intrusion relative to two-way operation.

Both the Exit Road and Car Park are low-lying, utilitarian estate features that do not dominate views or interrupt the house's visual primacy. Their limited scale, discreet appearance, and peripheral siting ensure they do not compete with the architectural form of the house. The road's curved nature blends in with the organic flow of the surrounding landscape. The bunding and proposed hedgerow planting will effectively screen it in views from the house. The Car Park adopts the same surfacing materials as the existing approved Staff Car Park, producing a coherent and unified appearance within this operational cluster.

Occasional vehicle movements introduce low-level noise and activity, though these effects remain modest, intermittent, and compatible with the established function of this working part of the estate. The historic working access to the estate has long served this area and continues to be the approved entry point for service vehicles. There is no change to public access, and while the development marginally reduces grassland cover, there is no significant loss of tree cover, with additional landscaping proposed to soften both the Car Park and the Exit Road.

Both features represent permanent estate infrastructure used daily, but remain technically reversible. Removal of the surfacing and restoration to grassland could reinstate the land to a near-original condition, though this would require deliberate intervention and associated cost.

Based on the assessment above, the Exit Road and Staff Car Park result in a minor level of change to the setting of the Grade II* listed Conholt Park. The impacts are:

- Localised,
- Low in visual prominence,
- Incremental rather than transformative, and
- Consistent with the functional character of a working rural estate.

This accords with Historic England's conclusion that the development results in "some additional harm" to the significance derived from setting. However, this harm is less than substantial, in the context of paragraph 215 of the NPPF, and must be weighed against the clear public benefits of the proposal, notably improved safety, circulation, and operational efficiency within the estate.

CONSIDERATION OF ALTERNATIVES

A detailed alternatives analysis, as required by Historic England's GPA2, demonstrates that other access or parking configurations would have resulted in materially greater heritage impacts.

Widening the Main Working Access would encroach into the Root Protection Areas of the historic tree avenue; redistributing parking into the Operational Zone would introduce sustained activity and visual clutter within the immediate setting of the listed buildings; and routing movements via Middle Conholt would shift traffic into more sensitive or constrained landscape areas.

The chosen configuration therefore represents the option that best minimises heritage harm while enabling safe estate operations.

JUSTIFICATION OF THE PROPOSALS

When weighed in the planning balance, the limited and less-than-substantial harm identified arising from the introduction of the Exit Road and Staff Car Park into an area of historically undeveloped Upper Parkland is concluded to be clearly outweighed by the public benefits delivered by the proposals. These are outlined in the already submitted Transport Assessment and Planning Statement, but are summarised again below.

1. Improved Safety across the Estate

The introduction of the Exit Road provides a safer, more coherent circulation system with staff no longer needing to manoeuvre in constrained areas. This reduces conflict points around the House, gardens, and principal arrival areas. It also means cars do not have to exit via the main working access where there are safety concerns as the visibility splay here is significantly obscured by existing mature vegetation. A safer estate environment for staff, contractors, residents, and visitors delivers a material public benefit consistent with NPPF and the Wiltshire Sore Strategy.

2. Enhanced Operational Efficiency of the Estate

The Exit Road streamlines circulation for delivery vehicles, maintenance contractors, and estate staff. The Car Park sits within an existing cluster of built form, immediately adjacent to the previously approved Staff Car Park. This reduces the need for staff vehicles to disperse across the estate. These operational efficiencies directly support the optimum viable use of the heritage asset, which the NPPF recognises as a public benefit in its own right.

3. Reduction of Vehicle Pressure in Sensitive Historic Areas

The new circulation pattern and Car Park ensure that servicing and staff movements are routed away from the principal designed frontage and formal approach to the House. In practice, this protects the highest-value parts of the setting from unnecessary disturbance.

4. Landscape Enhancements, Management and Visual Mitigation

As part of both the Exit Road and Staff Car Park applications, landscaping has been proposed to provide screening and enhance opportunities for biodiversity. Over time, this soft landscaping will further reduce visibility, strengthening the landscape character rather than weakening it.

ASSESSMENT OF HERITAGE BALANCE

Drawing together the heritage assessment and the proportional evidence provided, the proposals result in a level of harm that is concluded to fall at the lower end of the spectrum of less-than-substantial harm. In accordance with NPPF Paragraph 212, great weight has been given to the conservation of the Grade II* listed house and its setting, with the design specifically evolved to avoid the erosion of any primary heritage values.

This harm identified is considered to be of a minor and localised nature, fundamentally mitigated by the fact that the application site is not a pristine or undisturbed part of the designed landscape. Having been subject to some thirty years of fragmented management, equine use, and the introduction of utilitarian block buildings and modern sheds, the area's current contribution to the mansion's significance is already notably compromised.

The proposal replaces the current uncoordinated accretion of service activity with a more structured and coherent arrangement. By rationalising a degraded fringe of the estate, removing vehicle conflict from more sensitive parkland vistas, and establishing a formal programme of active management where little has previously existed, the scheme is concluded deliver a tangible long-term heritage benefit.

Maintaining the estate's viable long-term use – central to heritage-led conservation – assists in securing the preservation of the Grade II* listed building and associated Grade II courtyard buildings. On this basis, the limited harm identified is outweighed by the scheme's restorative benefits and enhanced parkland legibility, and the proposals are considered to satisfy the heritage balance.

ASSESSMENT OF WIDER PLANNING BALANCE

Beyond the heritage-specific assessment, the proposals also align positively with the broader objectives of the NPPF. The improvements to safety, circulation and operational efficiency support the social and economic dimensions of sustainable development as set out in NPPF paragraph 8.

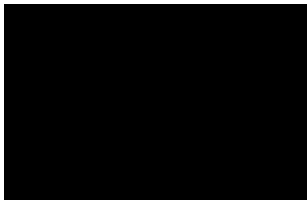
WHALEBACK

The creation of a safer, more coherent estate access system accords with NPPF paragraphs 115–116, which emphasise the importance of securing safe and suitable access for all users. In addition, the sensitive design and landscape mitigation measures respond to NPPF paragraphs 187–189, ensuring that the proposals integrate appropriately with the natural environment and contribute to the ongoing enhancement of landscape character. When considered in the round, these wider planning considerations further reinforce the acceptability of the scheme.

I trust that this addendum response addresses the consultation comments raised. Should you have any queries or require further information, please do not hesitate to contact me directly.

Thank you for your attention and assistance.

Yours sincerely,



Luke Smith
Associate Director

WHALEBACK